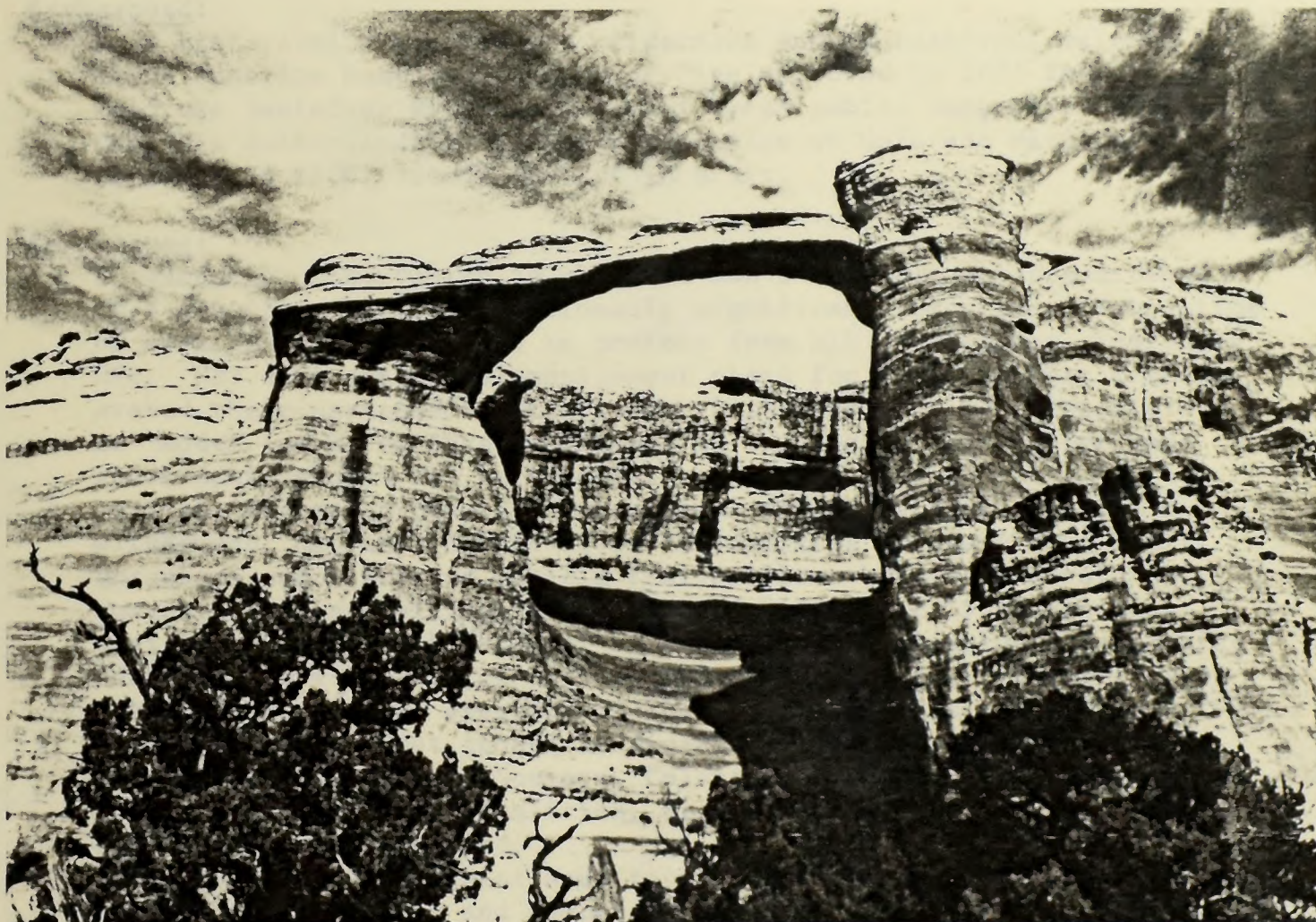


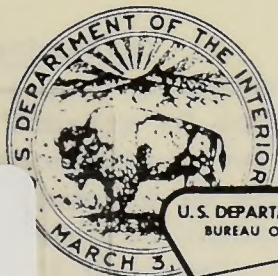


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RUBY CANYON NATIONAL CONSERVATION AREA



A Showcase for Multiple Use



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Bureau of Land Management
Grand Junction, Colorado

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P.O. Box 25047
Denver, CO 80225

BRIEFING ON PROPOSED
RUBY CANYON NATIONAL CONSERVATION AREA
Bureau of Land Management
Grand Junction, Colorado

Proposal: Congressional designation of a 105,000 acre Ruby Canyon National Conservation Area in west central Colorado.

Background:

- > Area historically managed for wilderness and recreational values.
- > Grand Junction Resource Management Plan approved in 1987 formalized land use decisions within context of broad public support.
- > Congress authorized NPS to study expansion of Colorado National Monument in 1989. Study now out in draft.

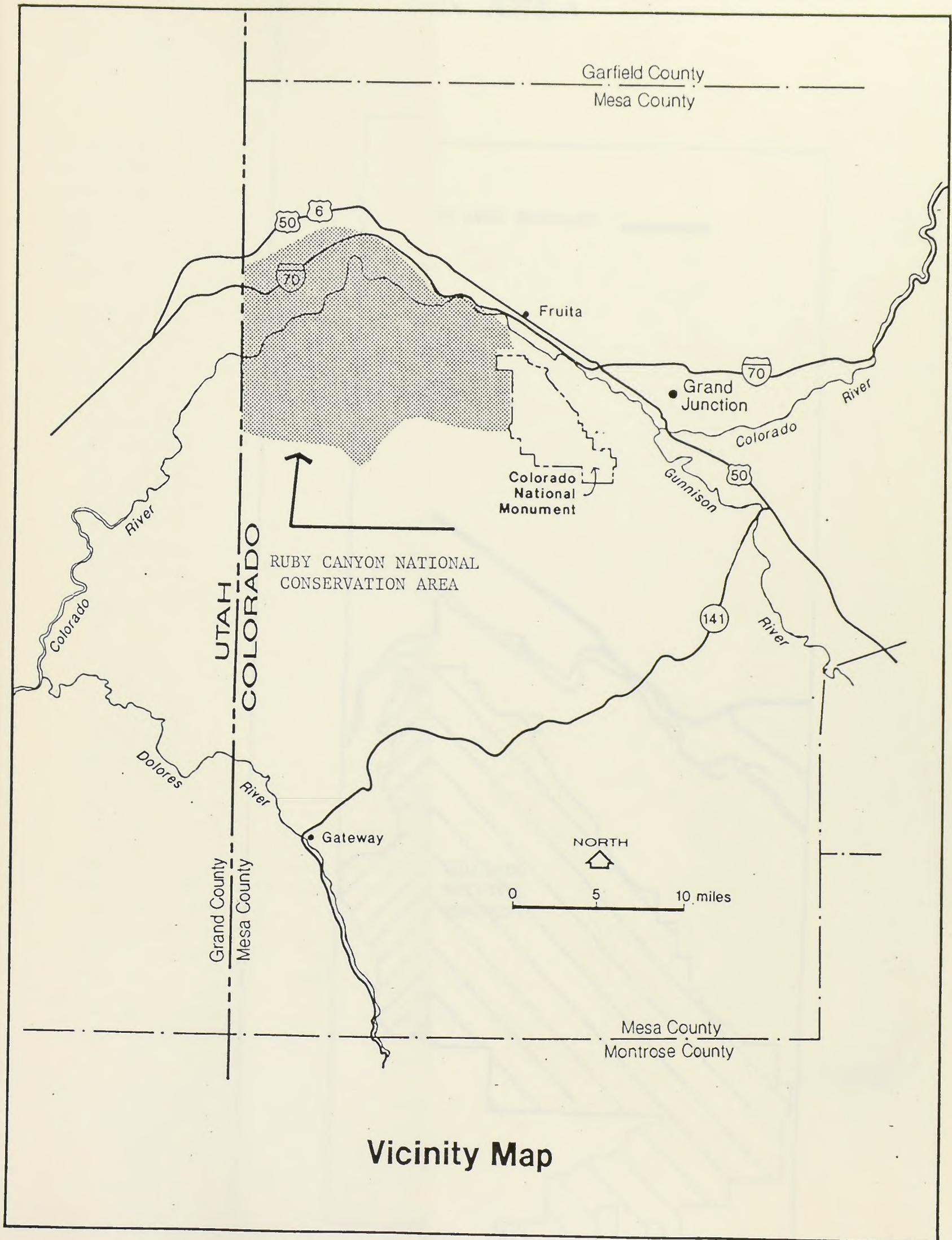
Key Issues:

- > **Stewardship**: Opportunity to showcase BLM's multiple use stewardship of a sensitive area with nationally significant resources. Protection of area is critical. Need to protect from all development, including NPS. NPS will not reveal management plans for area, BLM has clearly stated their management intentions. Described by Wilderness Society as "model for Wilderness management in the West". Reward for good stewardship should not be transfer to NPS.
- > **Tourism**: Chance to provide recreational diversity close to city -- Wilderness, National Scenic River, Kokopelli's Mountain Bike Trail, horseback and motorized vehicle trails, river boating and rafting, hunting, fishing, hiking, backpacking, skiing, etc. Some national designation seen as beneficial to assist BLM in managing and focusing tourism. This would also diffuse NPS's "Rand McNally" theory.
- > **Public Support**: Wide spectrum of local, regional and national support from interest groups as diverse as the Colorado Cattlemen's Association, Wilderness Society, Colorado Wildlife Federation, Colorado Environmental Coalition, Bighorn Sheep Society, and others should not be jeopardized.
- > **A National Land Use Ethic**: Need to work toward consensus on overall public land use ethic and responsible resource management. Park vs. strip mining dichotomy needs to be replaced with spectrum of alternative designations and range of uses nationwide. Everything that is nice does not need to be a park.

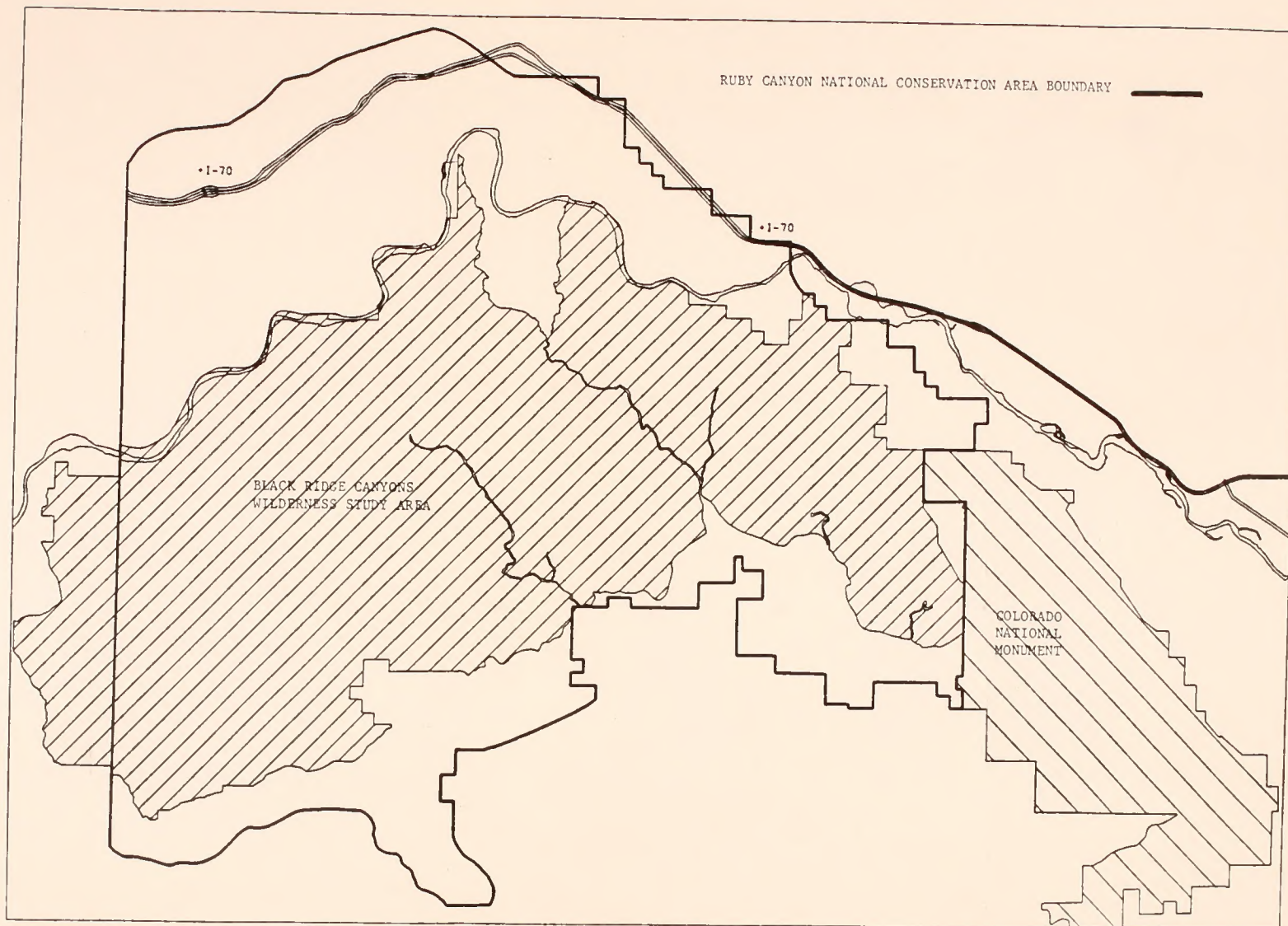
Action required: Continue to pursue the Ruby Canyon National Conservation Area through the Department and Congress as a showcase of multiple use management. Designations within the NCA should include the Black Ridge Canyons Wilderness and the Ruby Canyon of the Colorado National Scenic River. Compatible uses and resource management restrictions would be identified in a NCA plan to be prepared by BLM.

Attachments:

1. Map of proposed NCA.
2. Summary of current land use decisions and actions in the area.
3. Comments provided to NPS at outset of park expansion study.
4. Comments to NPS on draft park expansion study.
5. Selected comment letters and newspaper clippings on park expansion and NCA proposal.
6. List of briefings already conducted on NCA proposal.



RUBY CANYON NATIONAL CONSERVATION AREA



SCALE 1: 126720.
MSS - RIM/CSA

Current Management Decisions and Actions in the
Proposed Ruby Canyon National Conservation Area

The BLM has expended considerable funds, conducted numerous studies, held many public meetings and implemented many management actions over the past several years in the area proposed for inclusion in the Ruby Canyon NCA. It is our belief that the current management of the area reflects a balance between the interests of the local and regional public land users and the overriding national resource management goals of the Department of the Interior. Specifically, these actions have included:

1. **Wilderness Recommendation.** Of the 105,000 acres proposed for designation as a NCA, 70,000 acres are included in the Black Ridge Canyons WSA. The area has been recommended for designation as a Wilderness by BLM and will be forwarded to Congress for consideration by 1991. Such a designation would provide additional leverage in protecting the resources in the area from degradation from surface disturbing activities, but would allow for continued grazing, hunting and public enjoyment. Under BLM's interim management regulations, we are already taking several steps to protect the area from resource degradation.
2. **Land Use Planning.** The Grand Junction Resource Area Resource Management Plan (RMP), approved in 1987, developed with extensive public input and close public scrutiny, identifies a range of management actions for the area.

In the area north of the WSA, the focus is on providing developed recreation experiences. This includes Off-Highway Vehicle designations, group use areas, river access and boat launching facilities, and land and easement acquisitions to facilitate all of the above. In addition, several sensitive areas north of the WSA are being protected for scientific and interpretive purposes. These include the McDonald Creek Cultural Resource Management Area, the Fruita Paleontological Research Natural Area, Peregrine Falcon eyries, and the Rabbit Valley Research Natural Area

Besides wilderness designation, actions within the WSA include river corridor management under National Scenic River guidelines, limited road maintenance for access roads into the area, road closures to limit cross-country motorized vehicle travel, the acquisition of private inholdings along the river to consolidate BLM land ownership and facilitate management, withdrawal from mineral entry to exclude mining claims, improved river access, wildlife habitat improvements, the development of visitor use maps, increased law enforcement, signing and trail construction.

3. Management Actions. In the two years since the Resource Management Plan was approved, BLM has made considerable progress in implementing the decisions described above.
- a. National Scenic River. The lands along the river have been withdrawn from mineral entry, pending Congressional consideration of National Scenic River designation. Congressional support in Colorado and Utah is building and legislation is anticipated.
 - b. Road closures and OHV designations. Due to increased resource degradation from off-road vehicle travel in the west end of the WSA, BLM recently closed the BS Road to motorized access into the area. Motorized access directly to the arches in Rattlesnake Canyon was also restricted because of potential resource damage, and a trailhead was established for the public to hike into the arches. We are also currently working with the local motorcycle and ATV groups to map and sign the designated OHV trails in the Rabbit Valley area north of the river.
 - c. Land acquisitions and exchanges. We are currently processing several land exchange proposals to acquire lands along the river to improve river access and consolidate land ownership. In addition, BLM in Grand Junction has received approximately \$600,000 in Land and Water Conservation Funds from Congress to purchase private lands that will improve river access and facilitate management of the WSA.
 - d. Bighorn Sheep. In cooperation with the Colorado Division of Wildlife, BLM has participated in the successful relocation of desert bighorn sheep into the area. BLM is developing a statewide desert bighorn sheep management plan using data developed from our ongoing studies of the Black Ridge herd. We have purchased radio collars to help track the herd, provided helicopter time to observe and count the sheep, and currently are conducting a study to determine bighorn seasonal range use. Last year, two water guzzlers were installed in the WSA to improve bighorn sheep habitat. Sheep grazing north of Black Ridge will also be excluded to reduce conflicts with Bighorn Sheep.
 - e. Law enforcement. Grand Junction BLM became the first office in the state to hire a law enforcement ranger to assist in resource protection. Because of the sensitive nature of the resources in the Black Ridge area, this is a high priority for the ranger.
 - f. Trail development. Four hiking trails have been constructed and signs erected by local volunteers under BLM supervision to improve access to the area and facilitate public enjoyment of the WSA.
 - g. River management. Recreational use of the Colorado River through Ruby Canyon has grown in the past several years, but evidence of that use is minimal. Successful implementation of BLM's river management program with an emphasis on low impact camping and environmental ethics has made this a delightful stretch of river for a variety of river users, without having to impose use restrictions.

As use grows, we would like to provide BLM presence at Loma boat launch with river ranger/volunteers to promote river ethics, provide river and Kokopelli's mountain bike trail information, and provide parking area security. Possible future actions could include implementing a use permit system for boating in Ruby Canyon to better disperse campsite use, insure compliance with minimum impact land use practices and to limit overall use if necessary.

- h. Livestock grazing. BLM is currently working with Mountain Island Ranch, the grazing permittee on the west end of the Black Ridge WSA, to implement a holistic, integrated livestock management plan that is sensitive to the wilderness values in the WSA. The Allotment Management Plan that has been prepared is a model for the BLM and is seen as a critical step forward in ecologically managing livestock.

BLM is working with the other two major grazing permittees in the Black Ridge area to formally exclude livestock grazing from the canyon bottoms of Rattlesnake, Mee and Knowles Canyons, to reduce livestock/recreation conflicts. Combined with the areas excluded from grazing under the Mountain Island Plan, approximately one-third of the WSA would not be grazed under continued BLM management.

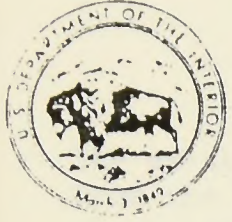
We are also in the process of working on an exchange to acquire private lands in the Rabbit Valley area. The permittee is anxious to move his operation to reduce conflicts with recreationists in that area. This will also improve river access and block up public lands in the northwest corner of the proposed NCA.

- i. Kokopelli's trail. During the past year, the Colorado Plateau Mountain Bike Trail Association constructed, signed and mapped the nationally famous Kokopelli's Bike Trail between Grand Junction and Moab, Utah. This trail is the first of its kind in the country and is instrumental in helping convey mountain bike ethics and to move mountain bike use out of the WSA and across the river.
- j. Paleontological resource management. In a cooperative venture with the Museum of Western Colorado, BLM has developed two interpretive paleontological trails north of the river, Dinosaur Hill and the Trail Through Time, and is working on a third at Split Rock. Maps and brochures have been developed. These areas have been the focal point for a major tourism campaign by the Museum and the City of Grand Junction.
- k. Cultural resource management. We are finalizing a management plan for the McDonald Creek Cultural Resource Management Area to help preserve and protect resource values in that canyon and the vicinity. Sieber Canyon, in the southern portion of the NCA, contains one of the most significant rock art panels in western Colorado.

1. **Wildlife management.** In addition to the Bighorn Sheep project, BLM has added lands to the Horsethief Canyon State Wildlife Area near Fruita in a cooperative effort to set aside wetland habitat lost through the Bureau of Reclamation's canal lining project in the Grand Valley.

We are also working with the Moab BLM, Colorado Division of Wildlife, Utah Department of Wildlife Resources and Mountain Island Ranch to better manage the mule deer herd in the west end of the Black Ridge WSA. Mountain Island has purchased radio collars to track herd migrations and cooperative efforts to have joint hunting seasons and herd management areas that cross state lines.

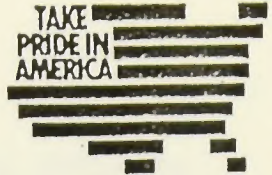
- m. **Visitor Center.** We are about to acquire the Horsethief Ranch at Loma in order to improve river access. The ranch house is an historic structure that would make an excellent Visitor Center for the NCA, with easy access to I-70 and location at the primary river access point and the trailhead for Kokopelli's Trail.
- n. **Recreation facilities.** We intend to improve facilities (parking, toilets, camping) and expand capacity at the Loma boat launch. We will continue management of the Rabbit Valley area for special group uses such as horse rides, Boy Scout events, mountain bike events, and group campouts. We would like to provide improvements and harden recreation use sites (toilets, parking, signing, campfire locations) in Rabbit Valley and Crow Bottom (Lamicq property if acquired). We also intend to develop a NCA users map to identify access routes, hiking and other special use trails, resource and special feature interpretation, and resource protection information. All of these actions are dependent upon increased funding.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT GRAND JUNCTION DISTRICT

764 Horizon Drive
Grand Junction, Colorado 81506



IN REPLY REFER TO:

1792
(7-161)

January 24, 1989

Jim Taylor, Superintendent
Colorado National Monument
Fruita, Colorado 81521

Dear Mr. Taylor:

The following comments are presented to the National Park Service (NPS) to assist in their study of the possible expansion of the Colorado National Monument into the Black Ridge Wilderness Study Area (WSA) currently managed by the Bureau of Land Management (BLM).

According to current regulations for new area studies [1988 NPS Management Policies, Chapter 2, now in draft form but directed for use in these current studies], the National Park Service must prove that an area meets three criteria for it to be considered favorably as a unit of the national park system. First, it must possess nationally significant natural, cultural or recreational resources. BLM firmly believes this is a special area with valuable, sensitive resources that require protection and should continue to be made available to the public for their enjoyment. The determination of national significance by the NPS however, is clearly subjective, and we will not quibble with their interpretation of this criterion.

Secondly, a new area must be a suitable and feasible addition to the national park system. Suitability is interpreted by the NPS as meaning that the resources present in the area under consideration are not adequately represented in the national park system or "comparably protected and presented for public enjoyment by another land managing entity." The slickrock canyons and natural arches in the Black Ridge WSA are already included in national monuments and parks in the Colorado Plateau, mostly in Utah where similar geology and climate have resulted in similar formations. In addition, similar resource configurations exist in several BLM Wilderness Study Areas in Utah, and are of course already protected and presented for public enjoyment in the existing Black Ridge WSA managed by BLM.

Feasability means that the area being considered is "of sufficient size and appropriate configuration to ensure long term protection of resources and to accommodate public use, and it must have potential for efficient administration at a reasonable cost." Because of its proximity to the existing national monument and the fact that the area being considered is nearly four times larger than the monument, it is assumed this criterion is met. In fact, it seems unreasonable to not also consider the area immediately adjacent to this unit in the state of Utah, since the geology and natural resources do not conform to the state line. If Utah lands are considered, we suggest that you seek public input from the citizens of that state, as well.

The existing utility corridor that separates the Colorado National Monument from the Black Ridge WSA contains a power line that provides the only source of electricity for the residents, businesses, radio towers and the Federal Aviation Administration's transcontinental VOR station in Glade Park. This may prove to be an obstacle to feasible management by the NPS. Your study should specifically address how you intend to manage the utility corridor as well as the growing number of radio towers and transmitters that would be within the proposed expansion area. In the past, the NPS has repeatedly expressed their objections to BLM for allowing the location of these towers so close to the monument boundary, and has not allowed Grand Valley Rural Power Lines to service their distribution line through the national monument.

In terms of efficiency of administration, the BLM is currently managing the Black Ridge area for about 75 cents an acre per year. The adjacent lands on the Colorado National Monument are costing the taxpayers more than \$30.00 per acre annually for administration by the NPS. BLM is interested in seeing the NPS analysis of administrative efficiencies for the expansion proposal.

The third criterion that the NPS must examine in considering new areas is alternative management. You must evaluate continued management by the BLM, including alternative designations under BLM management such as a National Conservation Area or National Recreation Area. BLM is currently managing such federally designated areas throughout the west. NPS regulations state clearly that "inclusion in the national park system is not the only option for preserving the nation's outstanding resources", and further that "New additions to the national park system will not usually be recommended if other arrangements can provide adequate protection for the resource and opportunities for public enjoyment."

As agreed to with the NPS, BLM will act as a consultant in the preparation of a detailed description of our current management of the Black Ridge WSA for inclusion in the NPS study. It should be made clear, however, that the BLM has expended considerable funds, conducted numerous studies, held many public meetings and implemented many management actions over the past several years in the Black Ridge WSA. It is our belief that the current management of the area reflects a balance between the interests of the local and regional public land users and the overriding national resource management goals of the Department of the Interior. Specifically, these actions have included:

1. Beginning in 1979, BLM has conducted inventories that resulted in the inclusion of the Black Ridge area as a Wilderness Study Area. The area has been recommended for designation as a Wilderness by BLM and will be forwarded for consideration by Congress by 1991. Such a designation would provide additional leverage in protecting the resources in the area from degradation from surface disturbing activities, but would allow for continued grazing, hunting and public enjoyment. Under BLM's interim management regulations, we are already taking several steps to protect the area from resource degradation.

2. The Grand Junction Resource Area Resource Management Plan (RMP), approved in 1987, developed with extensive public input and close public scrutiny, identified a range of management actions for the Black Ridge area. Besides wilderness designation, these include river corridor management under National Scenic River guidelines, limited road maintenance for access roads into the area, road closures to limit cross-country motorized vehicle travel, the acquisition of private inholdings along the river to consolidate BLM land ownership and facilitate management, withdrawal from mineral entry to exclude mining claims, improved river access, wildlife habitat improvements, the development of visitor use maps, increased law enforcement, signing and trail construction. It should be noted that the NPS was included in our scoping meetings for the RMP and the potential expansion of the National Monument as an issue was discussed. At the time, NPS decided such an analysis would not be appropriate.
3. In the two years since the Resource Management Plan was approved, BLM has made considerable progress in implementing the decisions described above.
 - a. The lands along the river have been withdrawn from mineral entry, pending Congressional consideration of National Scenic River designation. Congressional support in Colorado and Utah is building and legislation is anticipated.
 - b. Due to increased resource degradation from off-road vehicle travel in the west end of the WSA, BLM recently closed the BS Road to motorized access into the area. Motorized access directly to the arches in Rattlesnake Canyon was also restricted because of potential resource damage, and a trailhead was established for the public to hike into the arches.
 - c. We are currently processing several land exchange proposals to acquire lands along the river to improve river access and consolidate land ownership. In addition, BLM in Grand Junction has received approximately \$750,000 in Land and Water Conservation Funds from Congress to purchase private lands that will improve river access and facilitate management of the WSA.
 - d. In cooperation with the Colorado Division of Wildlife, BLM has participated in the successful relocation of desert bighorn sheep into the area. BLM is developing a statewide desert bighorn sheep management plan using data developed from our ongoing studies of the Black Ridge herd. We have purchased radio collars to help track the herd, provided helicopter time to observe and count the sheep, and currently are conducting a study to determine bighorn seasonal range use. Last year, two water guzzlers were installed in the WSA to improve bighorn sheep habitat.
 - e. Grand Junction BLM became the first office in the state to hire a law enforcement ranger to assist in resource protection. Because of the sensitive nature of the resources in the Black Ridge area, this is a high priority for the ranger.

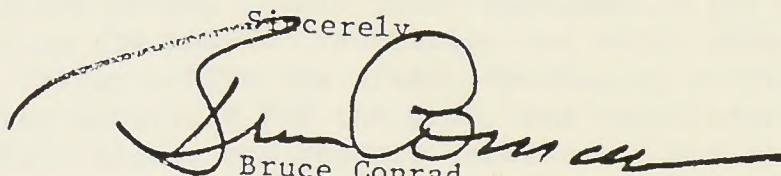
- f. Three hiking trails have been constructed and signs erected by local volunteers under BLM supervision to improve access to the area and facilitate public enjoyment of the WSA.
- g. Recreational use of the Colorado River through Ruby Canyon has grown in the past several years, but evidence of that use is minimal. Successful implementation of BLM's river management program with an emphasis on low impact camping and environmental ethics has made this a delightful stretch of river for a variety of river users, without having to impose use restrictions.
- h. BLM is currently working with Mountain Island Ranch, the grazing permittee on the west end of the Black Ridge WSA, to implement a holistic, integrated livestock management plan that is sensitive to the wilderness values in the WSA. The Allotment Management Plan that has been prepared is a model for the BLM and is seen as a critical step forward in ecologically managing livestock.

It should be clear by these actions that BLM has been making every effort to protect the resources in this area, and make them more available for public enjoyment, and doing so with limited funding and support.

Managing these outstanding resources is clearly within the mandate of the BLM as described in the Federal Land Policy and Management Act. Continued NPS efforts here and throughout the country to raid BLM of our most precious assets, clouds the future of these lands and makes it continually more difficult for us to fulfill our legislated mission. BLM has long understood the special nature of the Black Ridge area and for years we have been protecting it while trying to prod a recalcitrant Administration and Congress to allow us to implement the management actions that are really needed for long term protection. Now that we are making headway and Congressional support and funding appear assured, the NPS has suddenly discovered the area and seems to feel they could do a better job of managing the area than BLM.

It is BLM's intent to continue to work cooperatively with the NPS to complete this study. We urge you, however, to listen carefully to the public input you receive, to examine the effectiveness of the current management of the area, and to carefully consider any recommendations you make at the conclusion of this study. We appreciate your consideration of these comments and look forward to continuing our good working relationship with you.

Sincerely,



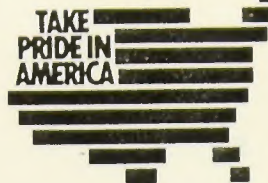
Bruce Conrad
District Manager



United States Department of the Interior

BUREAU OF LAND MANAGEMENT GRAND JUNCTION DISTRICT

764 Horizon Drive
Grand Junction, Colorado 81506



IN REPLY REFER TO:

1792
(7-161)

DRAFT

October 23, 1989

Mr Jim Taylor, Superintendent
Colorado National Monument
Fruita, Colorado 81821

Dear Mr. Taylor:

The following comments are presented to the National Park Service (NPS) on the draft study; Resource/Boundary Evaluation for Lands Adjacent to Colorado National Monument.

The Bureau of Land Management (BLM) was not given the opportunity to review the NPS study prior to its release to the public as required by the NPS Task Directives for this study. Because of this, a significant number of inaccuracies appear throughout the document, resulting in a study that does not give the reader an accurate basis from which to analyze the various alternatives. Both resource data and BLM management policies are seriously misrepresented in the NPS study.

BLM has on public record a firm proposal for management of the study area resources. NPS provides no specific management proposal, leaving the reader to guess what "appropriate management," "appropriate development," and "promotion of the area" by NPS actually means.

NPS has not adequately addressed the criteria, contained in NPS regulations, required for use in considering additions of new areas to the national park system.

The NPS study indicates that BLM will manage the study area for "extractive and consumptive uses," along with other multiple use objectives. In actuality, the overwhelming BLM management policy and land use planning decisions already in place for the study area are for protection and moderate promotion of the area's recreational, scenic, and natural values. BLM is presently pursuing wilderness designation for Black Ridge, Scenic River designation for Ruby Canyon, improving and hardening the heavier recreation use sites such as the Loma boat launch and Rabbit Valley public use areas, developing public information and interpretation materials for the area, and consolidating land ownership to both assure public access and protect resources. BLM also is actively involved in wildlife management for species such as desert bighorn

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sheep and mule deer, special protection for threatened and endangered species, such as bald eagle, peregrine falcon, and Colorado River squawfish, and protection, management, and interpretation of the areas having interesting archaeological and paleontological resources. Present livestock management includes significant restrictions, including complete closure of major areas to all livestock grazing, designed to give the area appropriate protection.

Throughout the study is the assumption that only NPS would provide appropriate promotion of the area, and NPS claims all credit for economic benefits related to increased tourism. Although BLM will continue to market and promote tourism through the National Conservation Area (NCA) package of opportunities, BLM also thinks it would be inappropriate to jeopardize existing wilderness values by overpopularizing the Black Ridge Canyons portion of the NCA, which has been a major thrust of NPS interests. Existing BLM promotion emphasizes dinosaur quarries, the Kokopelli's Mountain Bike Trail, low impact floatboating in Ruby/Westwater Canyons, wilderness hiking opportunities, and rugged four-wheel drive access to the Rattlesnake Arches area.

NPS cost analysis in the study downplays NPS increased management costs and the added public inconvenience and perhaps unnecessary federal permits or fees that would somehow be collected for all boating use in Ruby Canyon and all overland access on the Black Ridge Hunter Access road, B.S. road, and other access routes to the Black Ridge Canyons area.

There is little discussion of the management implications for existing public land users, such as horse riders, hikers, campers, and deer and waterfowl hunters. There is unrealistic discussion about the already existing problems of deer winter range overuse, which is not confined to just the Utah portion of the Black Ridge Canyons Wilderness Study Areas, and which has the historical potential to increase significantly.

Some public information on the Black Ridge Area is provided at the Colorado National Monument, however, the extent of this public service should be balanced by the fact that BLM is by far the dominant source of public information on the Black Ridge and Ruby Canyon area. In fact, due to ease of public access to the BLM office in Grand Junction (by Interstate 70 and Walker Field), a significant amount of public information on the Colorado National Monument and other NPS areas in the region is cooperatively provided by BLM. As public agencies, this should not even be an issue.

BLM comments on the NPS draft study are in three categories, which are; procedural problems with the study process, general problems with the study document, and specific problems with the study document text. I hope that NPS will take special care to adequately address the comments since, in its present form, the study document is seriously flawed and misrepresents the BLM administration of the study area. It is not possible for a member of the public to use the document to make the comparisons necessary for a judgement between leaving the study area under its present administration with BLM or transferring administration to NPS.

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I am extremely disappointed in the lack of quality and objectivity demonstrated in the document and, as a manager in Department of the Interior, am embarrassed to see NPS release the document to the public.

Sincerely,

Bruce Conrad
District Manager

Enclosure

DRAFT

PROCEDURAL PROBLEMS WITH THE STUDY PROCESS

Pl. Failure to follow Task Directive steps.

Beginning in December, 1988, the Bureau of Land Management (BLM) entered into a series of meetings with National Park Service (NPS) to assist in planning the study and the study process. This interaction between NPS and BLM was necessary, since BLM administers the public lands involved and would be relied upon to provide NPS with resource data needed for the study. BLM agreed to provide any requested data and assist in any way possible by making specialists available or assisting with analysis upon request. The culmination of this planning effort resulted in NPS approving the Task Directive for Resource Assessment and Study of Alternatives for the Management and Protection of Lands Adjacent to Colorado National Monument. This document was approved on February 3, 1989 by Lorraine Mintzmyer, NPS Regional Director, Rocky Mountain Region. In the Task Directive, BLM had agreed to be and was identified as one of the Primary Consultants for the study. The Project Schedule contained a project task, "F. INTERNAL REVIEW OF DRAFT DOCUMENT 1. Conduct review of draft document NPS (WASO, Region, Park), and BLM. This will include briefing of the director, WASO," which provided for BLM to be included in the internal review. This step allowing for BLM review before distribution of the draft study for public review was not honored by NPS. NPS refused to allow BLM to review the document prior to release, even though it was an agreed to step in the Project Schedule.

BLM viewed this internal review as essential for several reasons. First, to assure that resource data and BLM management alternatives of the study area were correctly interpreted by NPS and that that interpretation was evident in the study document. Second, many individuals had expressed concern that NPS would misuse the information BLM provided for the study. In response to these concerns, BLM made statements at the NPS hearings conducted in January 1989 that, at present, BLM had no reason to think that the study would not be objective and that BLM would review the document before it was released to the public to assure accuracy. NPS also made public commitment to this review. Third, NPS originally asked BLM for resource data and management alternatives for BLM lands west of the Colorado National Monument (CNM), south of the Colorado River, east of the Colorado/Utah boarder, and south to the southern boundary of the Black Ridge Canyons Wilderness Study Areas. This is the area which basically is consistent with the BLM recommendation to the Congress for designation as wilderness. The submissions BLM made to NPS for their study on April 17, 1989, and May 8, 1989, were based on this geographical area. On May 22, 1989, NPS gave BLM the geographical areas they had finally decided upon for their management alternatives. Since these areas varied from that used for the initial requests of data from BLM, BLM provided some additional data to NPS to cover the entire areas of their interest. BLM wanted to make certain that data provided and management options considered were properly applied to the

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respective alternative areas. Fourth, BLM had provided data and management alternatives write-ups to NPS in a very short time frame, to meet an unrealistic schedule which NPS set for themselves to complete the study. While NPS lengthened out the schedule for their analysis by three months, BLM did not have the advantages of this extra time and was concerned that in haste, something had not been overlooked or given to NPS in error. The internal review was viewed as an opportunity to check for accuracy and application after BLM had a chance to see the format and analysis in the draft plan.

When BLM heard that NPS probably would not meet their original schedule to have the draft document released to the public in July 1989, BLM made several requests of NPS to let BLM know when BLM could expect to receive the internal review document so that a rapid review could be scheduled. The sad consequence of failure to allow for BLM review is that the document released to the public contains many factual errors which do not allow a member of the public to make an informed review and assessment of the study. It also lends credibility to a concern that many individuals expressed in the NPS hearings held in January 1989 that NPS would not conduct an objective study.

P2. Failure to adequately address selection criteria for new areas.

Draft regulations for new study areas (1988 NPS Management Policies, Chapter 2, directed for use in the current studies) identify three criteria which the NPS must prove that an area meets in order for it to be considered favorably as a unit of the national park system. These criteria were presented to the public by NPS at the January 1989 study hearings and earlier to BLM. NPS has addressed one of these criteria, but leaves the other two noticeably void of attention, which may be a problem with the overall study process and will be addressed further in comment P3. "To be eligible for favorable consideration as a unit of the national park system, an area must (1) Possess nationally significant natural, cultural, or recreational resources, (2) be a suitable and feasible addition to the system, and (3) require direct Park Service Management instead of alternative protection by other agencies or the private sector." The draft study includes a section on analysis of significance, which addresses criterion (1) There should be similar sections presented to the public which explicitly address criteria (2) and (3).

The suitability and feasibility criterion (2) has not been demonstrated as being satisfied. In order to satisfy the suitability condition of this criterion, "an area must represent a theme or type of recreational resource that is not already adequately represented in the national park system," or "comparably protected and presented for public enjoyment by another land managing entity." BLM strongly thinks that the sliprock canyons, natural arches, and river canyons represented in the study area are already included in national monuments and parks in the Colorado Plateau, mostly in Utah where

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3

similar geology and climate have resulted in similar formations. In addition, similar resource configurations exist in several BLM WSAs in Utah and are, of course, already protected and presented for public enjoyment in the existing Black Ridge Canyons WSAs managed by BLM. To properly address the feasibility condition, it seems logical and appropriate to have included in the area of study consideration the contiguous area in Utah, which is a continuation of the same geology, natural resources, and BLM administration. Additional investigation of the utility corridor situation and communication facilities immediately west of CNM should be pursued to determine if the fragmentation of public lands to assist with feasibility for NPS at the expense of efficient management by BLM is warranted. This is the only feasible utility corridor to service the Black Ridge communication facilities and Glade Park residents. Along with the existing powerline, the corridor needs to be available to additional utilities that may be necessary for future growth on privately owned lands in the Glade Park area. Friction has already been noted between the present powerline company and NPS over refusal by NPS to allow the company to service their existing line on existing service roads through CNM. In identifying the boundaries for NPS alternatives, NPS excluded the area immediately west of CNM containing thirteen communication facilities and the Federal Aviation Administration's transcontinental VOR station, which are all serviced by the powerline. In so doing, NPS left about 1 3/4 miles of the Black Ridge Hunter Access Road under BLM administration. This kind of fragmentation of public lands administration is exactly what the land tenure adjustment program BLM has been engaged in is trying to eliminate. BLM would be left with a relatively small fragmented parcel of land to manage, a small isolated segment of access road to maintain, and administration problems associated with an isolated communication site without the ability to administer related power service actions to the site. This administration has been done to date with excellent cooperation from the power company. Another utility corridor related problem is the possibility of new utility needs within the corridor. Since this is the only feasible option for new utilities seeking to service the Glade Park area, NPS could expect pressure to use the corridor rather than incur the unreasonable and cost prohibitive options of going all the way west to Cisco, Utah or to the east of CNM.

With respect to the alternative management criterion (3), NPS has not demonstrated that BLM management is not sufficient to adequately protect the resources involved. A formal declaration of such would be required on the part of NPS and it has not materialized either in NPS public hearings, the study document, or any other form. The criteria that NPS must use for new area studies "recognize that inclusion in the national park system is not the only option for preserving the nation's outstanding resources," and further that "new additions to the national park system will not usually be recommended if other arrangements can provide adequate protection for the resource and opportunities for public enjoyment."

Procedurally, a recommendation as part of this document, or another separate decision document, should be required which spells out the NPS recommendation on management of the study area and the above criteria should be used as rationale for such a recommendation.

DRAFT

4

P3. The study process is not adequate or appropriate for informed decisions.

The objective of a study process should be to present decision makers with sufficient information with which to make informed recommendations and decisions. This is especially critical in this case because of the magnitude of the consequences for natural resources and users of the public lands. In the case of studies for new areas to be considered for inclusion in the national park system, the process is completely inadequate. Several serious flaws in the process include, (1) failure of NPS to follow the intent of the Congress and the Council on Environmental Quality with respect to environmental impacts disclosure under the National Environmental Policy Act of 1968 (NEPA), (2) failure of NPS to document the costs and impacts of a jurisdictional transfer by doing a plan of development before making a recommendation to the Congress on an action, and (3) failure of NPS to go on public record with a recommendation. These process failures apply to this particular study and, since the same basic process is followed elsewhere, to any study where jurisdictional changes in public lands are being contemplated.

1. Failure to follow the intent of NEPA

NPS has maintained that the study and report to Congress is merely a paperwork exercise requiring only a Categorical Exclusion Record (CER) to satisfy NEPA and that an in depth environmental analysis document would only be produced after a Congressional decision transferring jurisdiction of BLM lands to NPS. This appears to be an inverted approach, since it is the recommendation from NPS and a decision by the Congress that would allow all of the impacts which would be analyzed in the development plan to occur. In fact, the act of transferring jurisdiction is the major federal action rather than the action that such a transfer would allow to ultimately occur.

NPS appears to be improperly using the CER approach to circumvent the intent of NEPA, since an authorization, as claimed by NPS, by a Department of the Interior (DI) manual to use a CER (516 DM 6, Appendix 7), is conditioned by a DI manual (516 DM 2, Chapter 2, Appendix 2, Exceptions to Categorical Exclusions), which requires that DI agencies follow certain exception criteria and prepare environmental documents "for actions which may:...(2.3) Have highly controversial environmental effects." or "(2.4) Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks."

Both of these exception conditions exist with respect to this particular study. Beside these exceptions requiring an agency to shift from a CER to either an Environmental Assessment (EA) or an Environmental Impact Statement (EIS), an agency may choose at its own discretion to do an EA or EIS instead of a CER at any time. NPS has indicated that if the Congress directs them to do an EIS, then they will consider doing it. This is passing the buck to Congress when NPS, as the agency charged with the task, should immediately take all necessary actions to carry out that charge.

DRAFT

The act of transferring public lands from multiple use to a single use agency, especially given the acceleration of demands for various forms of recreation being placed on BLM lands and intent of the Federal Land Policy and Management Act of 1976 to retain the public lands in multiple use management for the good of the American people, is a major federal action which, in this case, requires a complete NEPA review with the resultant opportunities for full public and federal, state, and local government participation. NPS points out the "significant" nature of a jurisdictional change when in the analysis section of NPS alternative #1, page 24, paragraph 2, NPS says "The NPS would manage all the lands acquired. This alternative would significantly change the long term management concept of the area involved from one of multiple use to one based on preservation of natural and cultural resources." While BLM thinks that natural and cultural resources are being adequately protected under BLM management, there would be a significant change in management of the resources due to the different management philosophy of NPS.

2. Failure to fully disclose to the public and document for decision makers, all impacts associated with the development plan.

This plan should have already been completed so that there would be something for the public, BLM, NPS, DI, and Congress to compare with existing BLM management. Presently, there is nothing definite to compare. The public knows how BLM will manage the lands in question because that management is a matter of decisions derived with extensive public input and review and has gone through the Resource Management Plan (RMP) and EIS process. The majority of questions and concerns expressed regarding NPS management of the study area would not be addressed until after a transfer of jurisdiction had been made. BLM and NPS management at the Director level will have nothing firm from NPS to compare with existing BLM management decisions and actions. The Secretary of the Interior will have no firm estimates of development costs and level of that development before asking the Congress to "buy into" an action. The Congress will have a study to consider which has no cost or impact analysis associated with actual planned actions.

Decisions regarding matters this important should not be made without the kind of information a development plan would produce. If this situation exists here, it is also reasonable to expect that it exists in many other places nationwide.

3. Failure by NPS to make a recommendation through the Secretary to the Congress.

DRAFT

6

Congress, the public, and BLM should fully expect that NPS would follow their normal study process and conclude the study with a recommendation to Congress on an appropriate alternative. Initially, NPS stated that they would do this, which, they said could conceivably be to leave the jurisdiction with BLM. Apparently, because of criticism NPS was receiving for not doing an EA or EIS as part of the study, by their second public hearing held in Grand Junction, Colorado on January 25, 1989, NPS changed their approach and began to say that the study report would contain no recommendation, or preferred alternative. NPS did say that NPS would be willing to tell Congress what NPS thinking was on an informal basis. This simply fosters mistrust and, once again, appears that it is being done to avoid having to do a proper NEPA disclosure document as part of the study. If NPS plans to use the study document for an "informal" recommendation to Congress or use it as the basis for a recommendation to the Secretary, it would appear to be arguably violating the intent of NEPA. The process should require a formal position by NPS either in the form of a preferred alternative in the study document, or a separate Record of Decision available to the public.

DRAFT

GENERAL PROBLEMS WITH THE ~~DRAFT STUDY DOCUMENT~~

G1. Lack of consistency in the analysis of alternatives.

Lack of consistency both with respect to the level of analysis and treatment of topics in the alternatives is very apparent. Examples of this lack of consistency include:

1. Different geographical areas and acreages for NPS alternatives as compared to BLM alternatives is confusing to a reader trying to make necessary comparisons. Once NPS identified the geographical areas for their alternatives (#1 & #2), NPS should have adjusted the BLM alternative areas (# 3A, B & C) to conform to NPS alternatives. NPS should have made an appropriate acreage adjustment with an explanation of management in order to provide the reader with a consistent basis for evaluating the alternatives. BLM alternatives #3A,B, & C should be identical in geographical area to NPS alternatives #1 & #2. The application of the geographical areas to BLM alternative #4 would be as a part of the larger geographical area of #4, with the overall emphasis of an NCA of NRA applied to the smaller areas of the other alternatives.
2. Socioeconomic evaluations are presented only in NPS alternatives, having been left out of BLM alternatives.
3. The assumption of active marketing contained in appendix A is applied only to the NPS alternatives. This assumption provides the source of the large gain in tourism benefits shown in NPS alternatives. NPS totally ignored the possibility that active promotion is not only a possibility, but is extremely likely with BLM alternatives. A national designation by Congress of a BLM National Conservation Area (NCA), National Recreation Area (NRA), and/or Wilderness would produce considerable increased exposure and interest in the areas so designated. It is not appropriate to expect that an expansion of CNM or a Congressional designation of a national park will create interest and possible gains from marketing, while similar designations and a like amount of marketing will have no impacts on visitorship when applied to BLM lands. NPS' assumption on the level of marketing associated impacts is arbitrary, having no foundation based on a factual study. It is also interesting to note that NPS made an assumption of doubling of the estimated 1988 BLM use level which was expressly stated to NPS as a conservative estimate, with BLM cautioning NPS that "it is thought that more extensive use studies would reveal both higher use and growth trends." It is entirely possible that actual use revealed by appropriate studies would show numbers as high as the doubled 1998 estimate. It is important for NPS and a reader of the document to be fully aware of the assumptions surrounding data used for these use estimates.

DRAFT

2

4. The 280-acre Fruita Paleontological Site is discussed in NPS' alternative #2, which is entirely appropriate. However, the site is not mentioned in the BLM existing management alternative, alternative #3A, where management of the site is presently occurring. BLM has a long and successful history of management of the Fruita Paleontological Site, which should have been discussed.
5. Land acquisition is not presented in a balanced manner. Comparison of how this topic is dealt with in the alternatives presents an excellent, but sad, example of the lack of objectivity contained in the study document. The result is to down-play BLM existing management in relation to what is actually happening. The explanation of how NPS would deal with private land acquisitions is presented in Alternative #1, page 25, paragraph 2 & 3. It consists of 19½ lines. By contrast, the description of BLM acquisition program actions and related decision rationale is given in 4 lines and two words in Alternative #3A, page 32, paragraph 5. This short description conveys very little information to a member of the public as compared to the actual BLM program initiatives that are well grounded in land use planning decisions. There is a somewhat better description of BLMs acquisition program at the end of Appendix A, where a reader looking for a comparison between alternatives would be unlikely to find it. By way of comparison to the sketchy statement of the BLM acquisition program presented in the study, the material BLM gave NPS April 17, 1989, of BLM existing management of the study area, detailed land acquisition in four different program sections. Following is the material BLM presented to NPS detailing BLM management for use in the study.

"Land Tenure Adjustments: The objective of this program is to consolidate BLM lands to improve management efficiency and to acquire private land with special resource values. To accomplish this objective, the RMP identified planned actions to acquire private land that lies within or adjacent to large blocks of public land or has special resource values needed by the BLM to improve management efficiency. The RMP identified a set of 13 acquisition criteria that would be followed. Following the RMP guidance, the BLM identified specific lands to acquire which met the acquisition criteria. The first criterion is private land within areas recommended for designation as wilderness. The second is private land needed for management of wild and scenic rivers and wild and scenic study rivers. Several parcels of private land partially surrounded by the Black Ridge WSA have been identified for acquisition as have other parcels in Ruby, Horseshief, and Flume Canyons adjacent to the Colorado River. The BLM has been actively pursuing acquisition of ten of these parcels. The remaining parcels would be acquired from willing owners as opportunities for exchange or purchase develop. The BLM proposed that, to facilitate needed expansion, properties at the Loma launch site be purchased with Land and Water Conservation funds. The environmental community supported the proposal with the Congress, and legislation sponsored by Congressman Campbell and Senator Wirth was passed which provided \$600,000 for the Loma properties purchase. Negotiations are proceeding for these properties.

DRAFT

3

The BLM will continue concentrated efforts to acquire these properties, consistent with the interests of the owners."

"Off Highway Vehicles (OHV): ... Acquisition of certain parcels of private land bordering the study area will assist BLM in controlling OHV violations while relieving the private owners of nuisances associated with those problems. BLM is presently trying to acquire these properties through exchange or purchase, and will continue with such actions designed to increase the manageability of the study area."

"Transportation/Access: ... Three locations the BLM will try to acquire public land access are the mouth of Devils Canyon, the mouth of Flume Canyon, and the mouth of Pollock Canyon. The BLM will try to acquire easements in these locations or possibly accomplish the objectives through acquisitions."

"Recreation: Presently, negotiations are underway to acquire private land adjacent to the Loma boat launch, using Land and Water Conservation funds. The Loma acquisition is viewed by the BLM as a key to proper management of river use and use of surrounding areas. When acquired, the site would be expanded and the capacity increased. Negotiations are under way to acquire high resource value privately owned shoreline in Ruby Canyon and other lands adjacent to the study area. These acquisitions are viewed as essential to long term management and protection of the study area and surrounding areas."

..."Future management of the study area and adjoining BLM lands is governed by the following objectives which derive from the RMP.

... 5. Acquire and upgrade the Loma boat launch to include expanded shoreline boat launching space, overnight camping, and river ranger station capability (possibly a trailer). Provide site use supervision (safe parking - reduce vandalism). Utilize a combination of volunteers and BLM staff to provide adequate site supervision (24 hours/day - 8 months/year). ... 6. Regardless of scenic river designation decisions, acquire all private land in Ruby Canyon from willing landowners."

The above material given to NPS by BLM for the study provides sufficient information to present a description of the active acquisition program presently being pursued by BLM. It is in contrast to the following from the NPS study Alternative #3A. "BLM would continue efforts to acquire certain parcels of private land within the WSA. Presently, negotiations are under way to acquire private land adjacent to the Loma boat launch using Land and Water Conservation funds. The Loma acquisition is viewed by the BLM as a key to proper management of river use and use of surrounding areas including the WSA."

DRAFT

G2. Lack of a full range of NPS alternatives.

While the responsibility of formatting and developing NPS alternatives to include in the study was entirely that of NPS, it appears to BLM that there are many alternatives that were not considered. One of several other alternatives that could have been considered is that of not expanding the boundary of CNM, but rather taking advantage of other means as a way of expanding CNM visitor use and tourism. This would be a variation of a no-action alternative.

NPS has long complained about the name "Colorado National Monument" as being a problem. There have also been complaints from visitors that the name is confusing and does not properly fit the scenic resource. NPS could at any time, past, present, or future, work with interest groups and Congress to get the name changed to something that would be more attractive to visitors. Also, along with this name change, NPS could work to cultivate more use of the remote areas of CNM, which NPS personnel have indicated are not utilized to capacity. By taking active promotion actions, such as those suggested in this comment, NPS could accomplish considerably higher visitor levels without an expansion of CNM being necessary.

G3. Failure to deal effectively with issues raised at the public hearings.

One of the stated purposes for holding the public hearings in January 1989 was to identify issues that NPS should consider in the study. There were several critical issues raised that should have been included throughout the study, with appropriate analysis sufficient to allow for the public to obtain answers to their respective questions. A summary of the public hearings should have been included in the Public Involvement section of the study. This summary should have spelled out public concerns, which were strongly negative, to transfer of jurisdiction of the lands to NPS and a listed issues raised, which would be analyzed in the study. Following are issues raised which should have been, but were not resolved by the study.

1. Management of the Desert Bighorn Sheep herd located in the study area. While this issue was the focus of major public and interest group concern, it has not been properly dealt with in the study. NPS has repeatedly stated publicly that NPS was being unfairly characterized when concern was expressed that under NPS management, Colorado State Division of Wildlife (DOW) would not be able to manage the sheep by performing necessary trapping, medication, or propose sheep enhancing habitat projects; however, NPS has not addressed this question. It seems reasonable for NPS to say either they will or will not allow DOW such management options and specifically identify the kind of management practices NPS would pursue. The only statement made regarding NPS dealing with the sheep issue is in alternative #1, where NPS says "The alternative will include most of the area identified as desert bighorn sheep range. Sport hunting would be prohibited unless specifically provided for through legislation." This statement is inadequate in assisting a member of the public to understand the differences between BLM and NPS management.

The short statement NPS includes in BLM existing management alternative #3A that, "The BLM would continue to work with the Colorado Division of Wildlife for management of the desert bighorn sheep and their habitat and permit hunting of the species." is lacking in substance which would allow the public to know what BLM is actually doing. The write-up BLM gave NPS on BLM past, present, and planned management actions should have been included in the study. BLM identified for NPS, sheep population and habitat objectives, which BLM developed in consultation with DOW. BLM also identified for NPS the planned management actions, which BLM and DOW have and are undertaking to accomplish the objectives. BLM also identified to NPS the amount of money BLM had spent to date on the reintroduction of the sheep. In order to give a complete and accurate picture of BLM management of desert bighorn sheep and thus allow public review of this sensitive issue, NPS should have included the important material BLM gave to NPS.

2. Recommendation of the Black Ridge Canyons WSAs for wilderness designation. The issue of whether or not NPS would follow BLMs decision and recommend wilderness designation for the Black Ridge Canyons WSAs was a major concern raised by many during the January 1989 hearings. NPS has not addressed this issue in the study.

Also, the public expressed considerable interest in differences that would occur between management of wilderness by BLM or NPS. Wilderness was included in the NPS portions of the study in a very sketchy manner. Certainly, not in such a way that a study reviewer could make a comparison. Even though BLM gave NPS considerable written material dealing with wilderness in both the historical context and for use in alternatives, wilderness is not mentioned in the Land Use Planning section of the document. It would also seem appropriate to include a discussion of the outstanding wilderness resource in the Study Area Resources section. The material on wilderness presented by NPS on BLM alternatives, both in the text and Appendix B, is totally misleading and, for the most part, incorrect. It does not properly represent the written material BLM gave NPS for the study. It is impossible for a member of the public to understand BLM wilderness management from the material presented in the study.

Proper treatment of wilderness in the study should include an adequate historical background of the wilderness inventory and study process, including the BLM RMP/EIS and the BLM wilderness recommendation for the Black Ridge Canyons WSAs, a proper discussion of individual program management actions by BLM under Wilderness Interim Management Policy, and a comparison of BLM and NPS management of wilderness, specific to the Black Ridge Canyons recommended wilderness.

3. Impact of different agency management on recreationists using the study area.

An issue that was raised by many commenters at the January 1989 hearings concerned what they perceived as a negative impact a change to NPS jurisdiction would have on their recreational use of the study area. Many felt the different management philosophy would destroy their enjoyment of the area and that they would be displaced to other non-NPS areas if a change of jurisdiction occurred. This was certainly a concern of, but not limited to, the hunting public. Many recreationists in other categories expressed the same concern. The study is silent on analysis of impacts on existing recreational users of the study area. With respect to the NPS alternatives, NPS makes the statement in the Basis for Formulating Alternatives section, page 23, that "All evidence indicates that through normal actions such as signing, routine patrols, and interagency coordination, the alternatives, as presented, could be easily administered with minimal impacts on visitor use, staffing and funding levels for each Agency involved." This statement is misleading and should be evaluated in light of the strong opposition expressed by the public based on impacts on their use of the area due to a jurisdictional change (BLM has other concerns with the above quoted statement which will be considered in comment #5, below).

With the increasingly high demands being placed on BLM lands for disbursed recreation, the study should address the impacts associated with reducing the amount of public lands available for a much broader spectrum of recreational use, without the close supervision and intensive resource interpretation associated with areas under NPS administration.

Recreation should be a strong central theme throughout all sections of the study document, with a consistent set of definitions and analysis to assist the public in review. It would be helpful for NPS to give a definition of what a "recreation visit" and a "non-recreation visit" is to CNM. In appendix A, NPS indicates that "recreation visitation" to CNM was 374,735 for 1988 and that "Total visits, recreation and non-recreation, increased from 795,180 in 1983 to 920,898 in 1988." It would be helpful for NPS to give a definition of a "recreation" and "non-recreation" visit. NPS makes no effort to differentiate between the increase in recreationists who would use the scenic loop drive and other areas in the present CNM and the increase that would impact the study area. This is an extremely important piece of information to those who are trying to determine what a change in jurisdiction would mean for the relatively remote and primitive study area. An analysis of recreation impacts on the study area should include a breakdown in types of use and associated location of expected impacts.

As with much of the material BLM gave NPS for the study, some of the pertinent recreation use related BLM actions, past, present, and future, were not presented in the study. While some of the BLM supplied material was included in Appendix A, where it may be relevant to social and economic aspects associated with the study area, relevant BLM management actions and policies should have been analyzed in the appropriate BLM management alternatives.

4. Impacts on management efficiencies resulting from a change in jurisdiction. In comments dated January 24, 1989, to NPS on issues BLM wanted to see addressed in the study, BLM indicated interest in seeing a NPS analysis of administrative efficiencies associated with the expansion proposal. Many individuals expressed interest in why, given that most commenters wanted to see the study area remain under BLM management, should it be transferred to an agency that requires considerably higher funding levels to operate.

There are many questions still unresolved regarding costs, both in terms of dollars and efficiency associated with the proposed CNM expansion. The NPS statement on page 23, cited in item 4 above, cannot be accepted without further information and analysis. NPS should present in the study the "evidence" which they say indicates that "the alternatives, as presented, could be easily administered with minimal impacts on visitor use, staffing and funding levels for each Agency involved." Of course, there is no way to know what the real costs associated with NPS administration of the study area would be, since it cannot be determined until after NPS does a General Management Plan/Development Concept Plan, which wouldn't be done until after a transfer of jurisdiction occurs. This is a basic flaw in the study process, since it requires that decisions be made without sufficient important information. It is, however, possible to make some observations which seriously question the accuracy of the above NPS statement. First, the impact on the efficiency of BLM operations is not considered. It is assumed by NPS that there will be no conflicts resulting from the new boundaries in the NPS alternatives that would need attention. On page 23 in the Basis for Formulating Alternatives section of the study, NPS assumes the following. "In cases where the boundary of the national monument is expanded, it is also assumed that existing adjacent land uses will continue at the same levels and not represent a threat to the lands added to the monument." In light of experiences involving the current and much smaller CNM, this is not a realistic assumption. There have been situations involving private landowners, holders of BLM authorizations, and the need for BLM cooperative management that have demonstrated that the assumption is unrealistic. Based on historical experience, the expectation is that, given the size and configuration of the NPS alternatives, problems will arise which demand special attention. The assumption is subject to subjective interpretation which should be made explicit, given the importance of the validity of the assumption.

The estimates of additional costs to NPS included in alternatives #1 & #2 appear to be very low, considering the staff and overhead costs presently associated with operation of CNM. These questions arise regarding the cost estimates. First, the estimates deal only with low cost GS-5 and WG-5 positions. Will there be no management, supervision, administration, or higher salaried specialists associated with administration of the large acreages associated with the alternatives? This seems unreasonable. NPS has indicated that the study area lands offer additional opportunities for interpretative work, NPS would expect a considerable increase in visitation, NPS would place a high priority on acquiring private lands fitting certain criteria through donation, exchange, or purchase, and NPS would do additional promotion work.

The observation BLM has is that all of the above additional actions, which NPS has indicated they will be doing, will involve NPS personnel other than those identified in the estimates of additional costs. Was this additional cost overlooked, or will the additional workload be totally absorbed by existing CNM staff? If the latter is the case, are existing CNM staff presently underutilized? Would CNM require assistance from NPS Regional Office staff? These are all questions that need to be addressed, bearing in mind that the exact magnitude of additional work associated with and expansion of CNM would not be known until after completion of a development plan at some future date.

BLM appreciates that CNM Visitation Center handles many public inquiries regarding the study area. This is also the case with the Fruita Information Center and the Grand Junction Visitors and Convention Bureau. BLM experiences a tremendous number of requests for public information and assistance both by telephone and office visits. Often the office visits involve specialists time other than those with normal receptionist's duties. If the jurisdiction of study area lands were transferred to NPS, BLM would no longer be actively promoting the area and, aside from information BLM would provide on a cooperative basis, as CNM now does for BLM, the burden of this work would shift to CNM staff. Has this additional workload been built into the cost estimates?

An observation BLM has regarding the possible additional workload for NPS specialists, should a transfer of jurisdiction take place, is that BLM would no longer be engaged in the active land acquisition program which is presently ongoing. The study area presently represents BLM's highest priority as far as private land acquisitions. NPS would have to consider how to deal with any land exchange work, since other federal agencies often look at BLM lands as a source of land for exchanges, and BLM would have had to shift its acquisition specialist efforts to other priority work. BLM completed an exchange in 1986 at NPS' request to solve a management problem for CNM. The exchange took a considerable amount of Realty Specialist and other specialist's time to accomplish. Acquisitions can take a considerable amount of specialist's time, as can even a donation.

Another question BLM has is regarding any permitting that would be necessary on the river. Presently BLM has 23 permitted commercial outfitters, whose permits and river use are coordinated with the BLM Moab District Office. What kind of a permitting program would NPS be administering on the river, if a transfer of jurisdiction were to take place? What kind of a workload does NPS think would be involved with a NPS river use permitting system? How would such a system compare with the way BLM is presently administering river use? Along with the seasonal river use work that BLM does, which BLM assumes is what the additional seasonal personnel identified in the NPS alternative 2 cost estimate would be used for, BLM experiences quite a workload by other staff specialists associated with the river use management program.

One cost that NPS should identify in their study is the additional cost incurred by BLM and private landowners to coordinate with NPS on a new boundary, should a transfer of jurisdiction take place. Presently, BLM is managing a relatively solid block of public land. A transfer would increase the workload and associated costs of coordination to BLM. Also, a related additional cost to BLM and the taxpayers would result from the fragmentation of public lands that would occur under the NPS' alternatives. Presently, the entire study area and surrounding BLM lands are relatively solidly consolidated for management. Taking the center out of the BLM land would present a situation of fragmented land management, with resulting higher costs and less efficiency. BLM would have a very long boarder with NPS to coordinate use along, as would also the private land owners. The fragmentation of BLM land that would occur would leave BLM with some smaller relatively inefficient parcels of land to administer. A good example of this kind of fragmentation is at the west side of CNM where NPS has drawn the boundary to leave BLM with the communication facilities and associated rights of way to administer. This would also leave BLM with 1 3/4 miles of the Black Ridge Hunter Access Road to administer. This is exactly the kind of fragmentation of public lands that BLM is presently working hard through the land tenure program to try to correct. The impacts on BLM program management and associated costs and efficiencies resulting from a transfer of jurisdiction should be analyzed in the study.

5. Livestock grazing has not been effectively dealt with in the study document. Given the amount of concern expressed over livestock grazing as an issue, there should be a clear and adequate discussion of livestock grazing in the study area in the BLM #3A, existing management, alternative. Such is not the case. The information on BLM management of the livestock grazing program is fragmented throughout the document, and the short discussion contained alternative #3A is not adequate or accurate, since all of the area identified in the NPS alternatives, for which the area of the BLM

existing management alternative should correspond, is not WSA. A similar problem exists with BLM alternatives #3B & #3C. A map provided to NPS by BLM showing the configuration of the grazing allotments and their dependence on lands both inside and outside of the study area should be included in the BLM #3A alternative. This information, along with a discussion of the importance of BLM forage to the ranching operations, should be an important part of the analysis.

BLM manages livestock grazing on public lands based on certain laws and regulations, which require that grazing be allowed under controlled and regulated circumstances. The concept that the entire study area is open to unregulated grazing is not correct. It is allowed with constraints being imposed to protect resource values and coordinate with other public land uses. Presently, about 25 percent of the area recommended by BLM as wilderness is closed to livestock grazing, as is the portion of the study area north of CNM and east of the BLM recommended wilderness. This has been done through a cooperative effort of BLM and the livestock operators in order to facilitate resource protection, while accomplishing their need for forage use on BLM land.

Two large areas closed to livestock grazing to protect resource values exist on the west and east ends of the study area south of the river. In addition to these no grazing areas, two livestock operators have developed draft grazing use agreements with BLM which will change livestock grazing on their grazing allotments. These changes are being entered into for environmental reasons and have been in place informally for some time. Also, along with the eliminated grazing, about 14,000 acres will be formally transferred to cattle only instead of cattle or sheep. The changes include the following:

Lost Canyon Allotment - No. 6154: The Mountain Island Ranch, in cooperation with BLM, has been pursuing Holistic Range Management with their livestock grazing program. The Allotment Management Plan has been revised to reflect this experimental work that has been going on for 5 years. Based on the revisions in the plan, about 6,000 acres in the Black Ridge Canyons West WSA in Colorado have been removed from livestock grazing to protect the cryptogamic soils. This was effective June 9, 1989.

Colorado River Allotment - No. 6142: This allotment has not been utilized for livestock grazing for seven years. It was decided some time ago to discontinue livestock grazing on the allotment for resource protection reasons. Based on a decision memorandum dated December 3, 1986, the allotment, amounting to about 8,000 acres south of the river on the east portion of the study area will remain unallocated for livestock grazing because of the fragile resources, low production, and access problems.

Colorado Ridge - No. 6130, Black Ridge - No. 6138, and Knowles - No. 6136 Allotments: Based on a draft grazing use agreement dated September 1989, which when signed will formalize what has been occurring informally, about 1,000 acres in Rattlesnake Canyon and about 4,000 acres in Knowles Canyon will be identified as closed to livestock grazing. In addition to this change, about 14,000 acres will be converted to cattle only, thus removing formally the possibility of utilization for sheep. Elimination of sheep grazing was done as a precaution for the protection of the Desert Bighorn Sheep. The situation of domestic sheep impact on wild sheep is something DOW and BLM have been aware of and monitoring for since reintroduction of the Desert Bighorn Sheep. To date, there have been no problems identified but, if they did occur, BLM and the livestock operators were prepared to deal with the problem. The reason for taking these actions is to enhance and protect primitive recreation values in the Black Ridge Canyons WSA.

Lower Bench Allotment - No. 6125: Based on a draft agreement dated September 1989 about 2,500 acres in Mee Canyon will be formally removed from livestock grazing. The reason for eliminating grazing in this canyon is to enhance and protect primitive recreation values in the Black Ridge Canyons WSA.

An adequate discussion should be included in the BLM existing management alternative of the study, which will incorporate the above information and reflect an accurate picture of livestock grazing in the study area.

G4. Lack of accurate data and analysis in the study.

The presentation of BLM management of minerals, particularly locatable minerals, is full of inaccuracies throughout the document. This is a sensitive issue, which needs particularly close care in its presentation and analysis, but this was not done in the study document. Specific problems with the study text will be pointed out in the Specific Comments section. A major problem is that the information BLM provided to NPS was not included accurately in the study document. There are statements in the study text and appendix B that indicate that the scenic river corridor and a BLM Wilderness would be open to mineral location. This is simply not true and does not represent the information delivered by BLM. The material BLM gave NPS in the April 17, 1989, and May 8, 1989, submissions was not used accurately in the BLM alternatives. By switching the locatable minerals write-up for Wilderness with Wilderness Interim Management, or a WSA, NPS missed important management distinctions between the "impairment" consideration under Wilderness Interim Management Policy and the "unnecessary and undue degradation" concept under Wilderness. If NPS had simply used the material as it was given to them, the management concepts would have been presented correctly. Presently, there is no way a reader of the study can tell what BLM management is and, even worse, the material will prejudice a reader against BLM.

DRAFT

12

G5. Lack of presentation of BLM management of key study area resources.

It is frustrating to review the study and see how much of BLM existing management information important to making an informed decision is left out of the study. This is the case in with many resource management considerations where they are either left out completely or given rather brief treatment. One important study area resource that it would have been helpful for public reviewers or decisionmakers to have access to is BLM management of Sensitive, Threatened, and Endangered Species. Material BLM gave NPS contained considerable material on BLM management actions taken to protect the species and the frequency and type of species, which reflects on current BLM management. The study contains none of this material under the BLM existing management alternative, where it should be properly located. To have none of the existing management in the study and only the matrix display doesn't allow the public to know what BLM has been actually doing. It would be important for reviewers to know, for example, that there have been four years of successful Peregrine Falcon nesting in Ruby Canyon with 14 young fledged. Also, information such as the year round existance for several years of Bald Eagles in Ruby Canyon, with the expectation that they will soon establish nesting in the area, is important to a reviewer as an indication that the area is being properly managed. A complete display of current BLM management of this important wildlife resource is critical to an understanding that responsible management of the study area by BLM over the years has produced results.

DRAFT

SPECIFIC PROBLEMS WITH THE STUDY DOCUMENT TEXT

S1. Page 1, para 1. The reference to Black Ridge Canyons Wilderness Study Area (WSA) may be confusing since it is stated as singular. It is made up of 4 WSAs. It should be made plural, or there should be an explanation included.

S2. The last part of the paragraph, "all or part of which various interests have long proposed be included in an expanded national monument or park.", could be misinterpreted. Prior to now, there has only been one attempt to expand the Colorado National Monument (CNM). In the 1960s the possibility of such an expansion was studied and rejected. During the scoping process for the current BLM Resource Management Plan (RMP), NPS was asked if NPS wanted to raise CNM expansion as an issue to be studied in the RMP and corresponding EIS. NPS declined to have the issue studied at that time.

S3. Page 2, para 1. The paragraph is confusing. The correct term is Interim Management Policy. The study area is being managed based on the RMP, with the WSA portion subject to Wilderness Interim Management Policy (WIMP). Suggest rewriting the first sentence to read: "Alternative 3 will continue BLM management of the study area under decisions of their Resource Management Plan (RMP). Three management options exist for the portion of the study area identified for wilderness consideration. That portion will be managed using direction from BLMs Wilderness Interim Management Policy until Congress makes a decision on designation, at which time it will be managed either as Wilderness or as Recreation Lands, depending upon the Congressional decision."

S4. Page 2, para 2. Sentence 3 is confusing. The entire area is managed as a recreation emphasis area. Suggest rewriting sentence 3 to read: "Either one could also incorporate elements of any of the options identified under Alternative 3."

S5. Page 2, para 4. Just an editorial comment that, even though BLM worked with NPS on the Task Directive, the step allowing for BLM internal review of the draft study before distribution to the public was not followed.

S6. Page 2, para 6. It would be appropriate to give a summary of the public meetings, identifying the issues raised that the study should resolve and public sentiment expressed regarding expansion of CNM.

S7. Page 3, para 3. The correct term is Interim Management Policy, not Interim management plan.

DRAFT

S8. Page 8, para 7, last sentence. This statement is incorrect. There has been no mineral leasing in the WSA or area recommended for wilderness. The area is closed to mineral leasing and there are no existing leases so there will be no resultant development. Suggest changing the sentence to read; "The area is presently open to mineral location."

S9. Page 9, para 1. The Denver and Rio Grande Western Railroad line running through the study area along the river should be mentioned here.

S10. Page 9, para 4. This paragraph is incorrect and misleading.

Material given to NPS by BLM for the study identifies the historical background of BLM management of the area, which has been one of protection of the area's unique resources and directing those resources basically for recreation uses. NPS also left out the BLM Management Framework Plan (MFP) finalized for the area in 1974 and the Wilderness Inventory and Study Process, initiated in 1979. The study area has long been recognized by BLM as possessing outstanding scenic qualities, with opportunities for a variety of recreational uses. In addition, certain resources such as paleontological and rare plants and animals provide an overall setting conducive to rewarding human experiences. In the early 1970's, BLM, anticipating that it would be required to do something with wilderness designations in the future, categorized the Black Ridge Canyons portion of the area and certain other lands as "wildlands areas." A wildlands area was defined as having large expanses of undeveloped lands, demonstrating naturalness, and offering solitude and primitive area experiences to the visitor. BLM officially recognized this wildlands designation in its first generation land use plan (MFP) finalized in 1974. This plan was developed with public review and comment. The plan identified a recreation management emphasis for the study area and guided BLM management until development of the current RMP. The RMP finalized in 1987 identifies a set of management decisions which emphasize recreation. Thus, the study area has been long managed with formal decisions which restrict certain uses and allow those uses consistent with resource protection and recreation emphasize

Suggest rewriting the paragraph to read; "Within the area evaluated, all public lands have been and are managed by BLM. The area is managed under multiple-use principles and the historical management emphasis for the area is recreation. Since this is a special recreation management area, those uses that are compatible with resource protection and recreation are allowed." It should be noted that the term presently used to identify BLM lands to the public is "public lands." This term should be used throughout the study since it is the term with which the public is familiar.

As a note, the term off-road-vehicle has been changed to off-highway-vehicle (OHV) in current literature, which should be used throughout the text.

DRAFT

S11. Page 11, NATURAL RESOURCES under STUDY AREA RESOURCES. It would seem appropriate to include a discussion on the outstanding study area "wilderness resources" in this section.

S12. Page 11, para 6. The correct term is "headward", not "headword."

S13. Page 13, Continuation of para 3 from page 12, last sentence. This is a strange section for a comment like this on livestock grazing. It would seem more appropriate in the analysis of current management, which, if this statement is used, should also include an explanation of how these species of vegetation also exist in areas that have not been grazed by livestock.

S14. Page 13, para 1. The butterfly (*Papilio indra minori*) is unique at the race level, not at the species level.

S15. Page 14, para 3. While no sites have been tested and evaluated for the National Register of Historic Places, excavations have been conducted in the Little Dolores River drainage by the University of Colorado (Wormington and Lister 1951), Mesa State College (Clifton Wignall, personal communication) and Sieber Canyon (Sally Cole, personal communication). The excavations have shown that the sites contain a long and rich history of the area.

S16. Page 15, para 1 and 2. The problem with Ute occupation of the area is in trying to positively distinguish Ute-occupied sites from other possible groups (Nichens 1985). The most distinctive and certain evidence of the Ute is rock art which is found in the study area, as well as through-out west-central Colorado.

S17. Page 17, para 1. While it is true that there is no Ready Reference for the prehistory of the area, several studies provide good background. Two sample inventories (Hibbets et al, 1982, and Kjamme, 1982), which cover a large area, give good descriptions of patterns of site location. The most readily available and detailed excavation report is the 1951 University of Colorado study on the Little Dolores River valley (Wormington and Lister, 1952) and a recent analysis and synthesis of the region's rock art (Cole, 1988) which has been published by BLM.

S.18. Page 19, Top of page. NPS has only dealt formally with the "Significance" criterion and ignored the other two criteria, "be a suitable and feasible addition to the system" and "require direct Park Service management instead of alternative protection by other agencies or the private sector." The main heading on this page should be "EVALUATION CRITERIA", with "ANALYSIS OF SIGNIFICANCE" being one of three sections under the evaluation criteria heading. Each of the three sections should address formally, for the record, one of the three required evaluation criteria.

DRAFT

S19. Page 21, Conclusion, and para 1 and 2. The conclusion and related discussion is misleading. It should be made clear that it applies only to the "significance" criterion, and does not apply to consideration of the other two criteria NPS is required to address.

S20. Page 23, para 1, last sentence. The sentence reads "Furthermore, each Agency is currently managing similar resources nationwide." BLM has not only managed similar resources, but has managed, and is presently managing, the public lands that are the subject of the study. NPS may want to note that fact in this sentence.

S21. Page 23, para 3 and 4. BLM simply does not agree with NPS assumptions contained in these paragraphs. They are not consistent with reality. The general comments on the study, G3 (3), and (4), contain discussions of problems with assumptions contained in these paragraphs. NPS assumes away the very real management conflicts and problems, which are certain to arise with the proposed NPS boundaries and NPS management philosophy. The NPS study has not properly analyzed the significant impacts on existing study area users, increased cost of NPS administration, bordering land uses, increased coordination requirements by BLM, fragmentation of resource management programs (such as the paleontological resources which are presently jointly managed by BLM and the Museum of Western Colorado), not to mention the problem of the unknown, but possibly extensive impacts actions planned after a change of jurisdiction would take place may have.

Suggest conducting analysis in all alternatives of the subjects listed above, but left out of the study document analysis.

S22. Page 23, para 5, and continued on page 24. The alternatives are not properly aligned geographically to provide for a comparative analysis. Either in the "Alternatives" section, or in the "Basis for Formulating Alternatives" section, NPS should include a discussion that clarifies how areas BLM presently manage fit into the NPS alternatives. The BLM Alternative #3, with options, should coincide exactly with the acreage and geographical areas of the NPS alternatives. This subject was discussed in BLM general comments, G1,(1).

S23. Page 24, para 2, sentence 2. With respect to the reference of change in management concept, it is important to recognize that, through BLM existing decisions, the "natural and cultural resources" of the study area are presently being protected and preserved.

S24. Page 24, para 2, sentence 4. The study area is presently off limits to wood cutting. Suggest removing the word.

S25. Page 24, para 3. This paragraph puts off until some future date the really important issues raised thus far. For example, will NPS improve the road to the Rattlesnake Canyon Arches, or other locations, and, if so,

DRAFT

what kind of roads and how many would there be? The implication of this paragraph is that the possibility exists that additional visitor and support facilities will be required, but how much and where? Study reviewers want to know what NPS has planned for the study area in the way of specifics, to which legitimate estimates of administrative, cost, and resource impacts can be assessed. Suggest simply stating what is known; "NPS development needs will not be known until after a General Management Plan/Development Concept Plan for the study area is completed. The plan will only be done if there is a transfer of jurisdiction by Congress from BLM to NPS."

S26. Page 25, para 2 and 3. With respect to the costly and time consuming work required for acquisitions, who will do this work and what will it cost? NPS makes no provision in administrative cost estimates for this kind of work. On page 27, para 6, NPS says that "This alternative does not propose a significant change in development, operation costs, or land acquisition." BLM has already determined through extensive planning and public input that many private lands within the study area need to be acquired by the federal government in order to properly manage and protect the resources. Given this situation, it seems that NPS should decide to either acquire private interests or not acquire them. Suggest adding a legitimate cost estimate to these two paragraphs, which will give the reviewer some idea of what the NPS alternative would really cost.

S27. Page 25, para 3, sentence 1. The term "park" is used. Is this an appropriate term to use here? Isn't the alternative dealing with a boundary expansion of CNM?

S28. Page 25, para 4. With respect to scientific research that would be allowed under NPS management, BLM presently has ongoing scientific research projects in or adjacent to the study area centered both on archaeological and paleontological resources. These involve research at the Fruita Paleontological site and two archaeological research projects centered in the Little Dolores River valley, which will result in information applicable inside of the study area. These research projects should all be included in the analysis in BLM #3A alternative to give the reader information on what is actually occurring so that they can make a proper comparison.

S29. Page 25, para 5 and 6. These two paragraphs do not give an accurate picture of livestock grazing in the study area. They should be rewritten to consider impacts on ranching operations involved from an elimination of grazing in the study area. The term "equitably phase out grazing" needs to be related to definite impacts on the ranching operations and what the magnitude of those impacts would be. The sentence in paragraph 6 which says "In the belief that livestock utilization and its recurring support activities would pose a long-term threat natural and cultural resources, every reasonable effort would be made under NPS management to equitably phase out grazing ..." is a subjective position taken by NPS, since it has been long standing BLM policy, as mandated by Congress, to insure that any proposed activity on public lands do not create impacts to cultural resources. It is not clear how exclusion of activities such as grazing would significantly lessen impacts to sites.

DRAFT

S30. Page 26, para 1. NPS should include here what they intend to do with respect to management of the Desert Bighorn Sheep herd in the study area.

S31. Page 26, para 2. The purpose of constructing the Black Ridge Hunter Access Road in the first place, was to get some hunting pressure into the area so the herd could be harvested. Over the years, this constant hunting opportunity is an influencing factor on deep populations that has to be considered. It allows DOW a needed management tool, which when coupled with timing options on hunting, can be very effective in herd management.

S32. Page 26, para 3. When considering impacts on deer populations from predators in the study area, the Black Ridge Canyons WSAs have been put off limits by BLM to any aerial control by USDA, Animal Protection and Health Inspection Service. Since aerial control is the most significant factor in the reduction of predators in the area, it is expected that there would be little change from present BLM management. Lack of either predator or deer controls in the CNM has not been effective in preventing agricultural damage in the Redlands.

S33. Page 26, para 5. Would NPS permit additional needed utility services to be located in the utility corridor?

S34. Page 27, para 1. Since there are differences as to how NPS would manage wilderness vs non-wilderness, these differences need to be spelled out in detail. Also, would NPS recommend the Black Ridge Canyons WSAs for wilderness designation, as BLM has?

S35. Page 27, para 2. The estimate of increased funding required by NPS to administer the study area is low since many associated management costs are not included.

S36. Page 27, para 4. Regarding the "vault toilets at trailhead (one time cost) ...\$2,000," BLM has budgeted toilets for several locations associated with the study area. The locations are the Rattlesnake Arches Trailhead, Knowles Canyon Trailhead, and Loma River Launch (included in Alternative #2). The NPS cost for the toilets is unrealistic. Based on an NPS publication for use in estimating project construction costs, National Park Service - Prepared by Denver Service Center, Branch of Estimating, October 1988, page 18 "Pit toilet, small vault type-concrete vault, \$20,000/each," the true cost would be much higher, more like \$40,000. Since the cost figures in the document do not include planning, design, or project supervision, it could be even higher. Also, the cost of the raft and related equipment could be higher than the NPS estimate.

S37. Page 27, para 6. The first sentence could use some clarification. "This alternative does not propose a significant change in development, operation costs, or land acquisition." Does this statement refer to a

change from what BLM is presently doing, or from what BLM is proposing to do in the study area, or something else? NPS assumes an increase of 2.5 percent in tourism resulting from this alternative. There is no similar assumption of a gain in tourism that would result from a designation of a BLM Wilderness, or a BLM National Conservation Area by Congress. Both of the Congressional designations of BLM lands would bring about additional exposure and interest, both on a regional and national scale. NPS should be consistent in its assumptions and show an expected change in visitor use associated with these two national designations. It should be included in this paragraph and in the Summary of Economic Impacts which follows.

S38. Page 28, para 3. The last sentence is interesting, in that the rationale for including the river corridor in the NPS expansion proposal is that it "would consolidate management under just one Agency and thus simplify efforts associated with visitor and resource protection, interpretation and provide adequate and consistent levels of visitor services." This is exactly how the study area is being managed presently by BLM. In addition, the entire study area is consolidated under BLM administration with the adjoining BLM lands.

S39. Page 28, para 5. The term "outstanding mineral interests" is used. The meaning should be explained.

S40. Page 28, para 6. While the status of the railroad right-of-way may not change, NPS should detail whether they would engage in administrative procedures which could alter coordination requirements for the railroad.

S41. Page 28, para 7 and continuing on page 29. "The scenic river corridor north of the river was also withdrawn from mineral leasing and there are no outstanding mining claims within the area." The statement with respect to "mineral leasing" is incorrect. Leasable minerals are not subject to withdrawal, since BLM has a discretionary decisionmaking. BLM can close an area to mineral leasing. While the study area south of the river is closed to mineral leasing, the river corridor north of the river can be leased for oil and gas, but it would be subject to a no surface occupancy stipulation, which means that no development could occur in the corridor. The next sentence "The area is, however, open to mineral location under the general mining laws.", is incorrect and should be removed. The scenic river corridor has been withdrawn from location under the general mining laws.

Since NPS is considering the mineral withdrawal situation here, it would be a good place to point out that, in order to protect the Fruita Paleontological Site, it was withdrawn from mineral location by BLM.

S42. Page 29, para 4. Once again, the estimate of additional cost is low. Comment G3 (4) addressed cost concerns associated with these estimates in detail.

DRAFT

S43. Page 29, para 6. According to the NPS project cost document discussed in comment S36, the four vault toilets indicated will cost considerable more than the \$4,000. Because of volume of use, the two at Loma would have to be large vaults, which, according to the NPS project cost document would cost \$35,000 each. The possibility exists that toilets alone could cost NPS \$110,000. NPS should rethink costs associated with these estimates and use NPS project planning cost data, unless NPS explains why it is inappropriate.

S44. Page 29, para 8. Once again, NPS needs to explain why an effective marketing program could increase tourism when applied to an expanded CNM, but makes no similar assumption regarding effectively marketed BLM lands.

S45. Page 30, ALTERNATIVE 3: DESCRIPTION. The area defined for BLM alternatives should be adjusted to correspond to the two NPS alternatives. The area and write-ups based on the original request NPS made of BLM for data, should have been calibrated to the geographical areas NPS came up with in June 1989, when they formulated NPS alternatives. Areas and management by BLM for the Black Ridge Canyons WSAs, Black Ridge Canyons recommended wilderness, and Scenic River Corridor are all components of the larger NPS alternative areas.

- TO BE CONTINUED -

B

Section

Tuesday, January 24, 1989

Monument plan finds opposition

Dann Hayes
Daily Sentinel

Supporters of a proposal to turn the Colorado National Monument into a national park weren't around when the National Park Service held the first of five public forums on the issue Monday.

The meeting at Fruita Monument High School brought out 30 to 40 opponents to the plan, which could expand the boundaries of the monument to the Utah state line.

"I think what it's all about is being able to enjoy our own back yards, and to do it the way we want to do it," said Jack Cassidy, a Fruita resident and past president of the Colorado Outfitters Association. "I think we can do it without government intervention."

He added that people have learned to enjoy the area without any help from the park service.

"I think we have the ability and the know-how to be able to enjoy our own country, at our own pace," Cassidy said. "The area is now public property. It is available now to everybody. You are not going to provide anything more than we already have."

Also of concern was the future of

the desert bighorn sheep on the land in question.

"If they only take a little of the area, they'll take where the sheep are," said Dave Sell, a regional spokesman for the Colorado Bowhunters Association. He said he was speaking as a private citizen.

"Look at the history of game management by the park service," he said. "The park service has no history of management. Why aren't the buffalo in the monument anymore?"

Several people in the audience expressed concern that the meetings were futile.

"I would bet that 80 percent of the people here ... think this is a cut-and-dry deal," said Darrell Gilks of Montrose.

But officials of the park service said no decision has been made.

The next meeting will be at 7 tonight at the Colorado-Ute Building in Montrose. Other meetings are: 7 p.m. Wednesday, City/County Auditorium, Grand Junction; 7 p.m. Thursday, Colorado Bank & Trust Annex Building, Delta; and 7 p.m. Friday, Glade Park Community Center.

By virtue of the ability to dangle carrots such as tax incentives and a check that doesn't require lengthy congressional approval, the Trust for Public Lands estimates it has saved taxpayers almost \$95 million through transactions involving 496 parcels of land valued at more than \$376 million.

January 28, 1989

Neighbors wary of park proposal

Gary Harmon
Daily Sentinel

Glade Park residents said Friday they aren't all that interested in expanding the Colorado National Monument, particularly if that means uses they now enjoy would be restricted under National Park Service jurisdiction.

The National Park Service conducted the last of five meetings on the possible expansion of that monument and of the Black Canyon of the Gunnison National Monument.

The potential expansion of the Colorado National Monument encompasses about 75,000 acres that now are managed by the Bureau of Land Management and contained within the Black Ridge Wilderness

Study Area

With the expansion, the monument could become a national park.

Under the BLM, the lands are available for multiple uses, including mining, grazing and hunting, all of which residents said they would like to see continued.

And one resident, Warren Gore of Gore Livestock Inc. and the Mesa County Cattlemen's Association, said he wants the land to stay in the hands of the BLM.

"If it goes to the National Park Service, only a select few will be able to benefit," he said.

Gore said he doubted whether the federal government would pave a road to a national park at Black Ridge "so we could all go down to

Please see Park, page 8A

Park

From Page One

Rattlesnake Canyon and enjoy arches in our Winnebagos."

Gore said establishment of a national park could hurt his business economically, and that hunters, backpackers, all-terrain-vehicle users, ranchers and miners would come out the losers in a national park.

Most of the approximately 35 people who attended the meeting were there to get information.

Janice Carpenter, who owns the Glade Park Store with her husband, Terry, said she was worried that dinosaur digs by the Museum of Western Colorado would be discontinued if the area were to become a national park.

Wayne Gordon, leader of the National Park Service team studying the Black Ridge, said research by bona fide institutions would be permitted, but that amateur bone-hunting would be prohibited.

Residents worried that changing to a national park would bring about a prohibition of motor-driven boats on the Colorado River were told that the National Park Service allows motors in several parks, including Yellowstone, Grand Teton in Wyoming and Glacier in Montana. The Colorado River borders the Black Ridge Wilderness Study Area.

Whatever happens to Black Ridge won't happen until later this year, after the park service completes its study.

That study includes making a determination as to whether the area is a "nationally significant, outstanding resource" worthy to make it a park, Gordon said.

Public comments will be received by the National Park Service at the Colorado National Monument through Feb. 10.

National Park Service Director William Penn Mott is to decide whether the area is significant enough to warrant park status by March 31.

Groups rip monument expansion

Bob Silbernagel
Daily Sentinel

A combination of hunters, miners, ranchers and environmental groups spoke out Wednesday night against a proposal to expand the boundaries of the Colorado National Monument.

Roughly two-thirds of the 32 speakers at the packed meeting in the City/County Auditorium opposed the proposed expansion. With the expansion, the monument could become a national park.

The U.S. Bureau of Land Management does a good job managing the 75,000-acre Black Ridge Wilderness Study Area west of the monument, and the area shouldn't become part of a national park, opponents said. Sportsmen said they didn't want to see hunting lost in the area, as is normally the case if an area becomes a national park.

Supporters contend having a national park outside of Grand Junction would increase tourism.

Wednesday's meeting was the third of five scheduled this week to consider the expansion of both the Colorado National Monument and the Black Canyon of the Gunnison National Monument.

The park service is conducting studies into the expansions of the two areas at the request of Congress. The agency is to have a draft recommendation on the proposals completed by July, with a final recommendation scheduled for September.

Another hearing is scheduled for 7 tonight in the Colorado Bank and Trust Annex building in Delta, and the last meeting is at 7 p.m. Friday in the Glade Park Community Center.

For people such as Daryl Iser, with the Rocky Mountain Bighorn Sheep Society, the proposed expansion at Colorado National Monument is not good.

"Why is the BLM wilderness management not viewed as proper management?" he asked. "There is no guarantee the park service will continue this as wilderness status."

John Singlaub, area manager for the BLM, questioned the efficiency of the park service management.

Please see Monument, page 8A

January 26, 1989

Monument

From Page One

"The BLM is currently managing the Black Ridge area for about 75 cents an acre per year," he said. "The adjacent lands on the Colorado National Monument are costing the taxpayers more than \$30 per acre annually for administration by the National Park Service."

But the lower cost for BLM management is one of the things supporters of the park expansion worry about.

"The BLM is doing a good job, but there are some things they just

can't do," said Mike Pewters. "Archaeological sites aren't being protected by the BLM ... the park service can do a better job."

Kirk Koepsel of the Colorado Environmental Coalition said he opposed expanding the monument into the Black Ridge area, but thought the Little Bookcliffs should become a national park.

"Mount Garfield is as well-known in Grand Junction as the national monument but it gets no special protection," he said. "We're not satisfied with the BLM's management of that area."

Desert bighorn season in jeopardy

Monument addition could put end to hunting large sheep population

Dann Hayes
Daily Sentinel

The first hunting season for the desert bighorn sheep near Grand Junction could be the last if a proposed addition to the Colorado National Monument is completed. The area in question — about six miles west of the present national monument boundary to Rattlesnake Canyon — just happens to be home to nearly 80 percent of the state's desert bighorn sheep population. The first hunting season in Colorado for the desert bighorn is scheduled for November 19 to December 18. Two hunters will be picked by draw for the hunt. If that land is acquired, the hunting season for the desert bighorn could be over.

"We're concerned about it," said John Ellenberger, senior wildlife biologist for the DOW in Grand Junction. "We started the desert sheep population, and we've got a good hunting population." Located from the western boundary of the Colorado National Monument to approximately six miles west along the Colorado River, the land in question is a mirror image

of the present monument. Sheep canyons and arches are home to the desert bighorn as well as deer, hawks and other animals. Officially called the Black Ridge Canyons Wilderness Study Area by the Bureau of Land Management, desert bighorn sheep were introduced in November of 1979, when 11 animals were gathered from herds in Nevada and Arizona. Two other transplants — 17 animals in June of 1980, and nine in November of 1981 — were also established.

Two of the transplants took place near Devil's Canyon, about two miles west of the monument boundary. The third was attempted in Monument Canyon, directly on the national monument, but the animals left to join with the other two groups.

"The original idea was to transplant sheep into the national monument," Ellenberger said. "They went in and looked at it and found that the best habitat was outside the park."

There are two options that concern the area in question. One of them calls for the introduction of the land into the boundaries of the national monument.

Currently the funds for a feasibility study are before Congress. According to Jim Taylor, director of the Colorado National Monument, it will take nearly a year before those funds could become available.

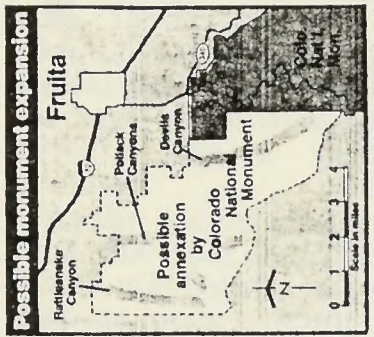
"At this point nothing has been done," Taylor said. "A determination has to be made whether (the resources) are nationally significant. But it's going to be some time to see if the funding is available."

According to Taylor, the top priority of the park service is to make sure the land in question remains protected. Currently, "they're doing that as a wilderness. I don't see anything as being a major controversy."

Other groups don't see it that way. Currently the area covers nearly 74,000 acres from the monument boundary to the Utah border, with 2,760 acres actually in Utah.

"The park service wants to expand," said Daryl Iser, Grand Junction representative of the Bighorn Sheep Society. "They ... want to expand and take in more area — which is what I call empire building."

"If it's taken into the national



park system, there would be no use in the area, forever."

That fear is echoed by Ellenberger.

"There is a remote chance that they would allow hunting," he said. "They allow hunting in parts of the Grand Teton National Park with the elk herd there. But I think the chances of that happening here are slim and none."

The other option, the one that both the DOW and the Bighorn Sheep Society support, is a plan by the BLM to include the land — currently controlled by the BLM — into a wilderness area.

Already designated a wilderness study area, it would allow the BLM to manage the site as a wilderness area.

Race

Expansion controversy nothing new to GJ area

Dann Hayes
Daily Sentinel

Controversy surrounding expansion of the Colorado National Monument is nothing new to the residents of the Grand Junction region.

In its 77 years of existence, controversy reared its head when the park wanted to upgrade and build additions to the present road system throughout the park.

An attempt to give away land in 1956 — Red Canyon, Cold Shivers Point and No Thoroughfare Canyon southeast of the park — because that section was too far away from the monument headquarters, also met with controversy.

Another incident arose when, in 1961, the Mesa County Wool Growers Association voted unanimously to oppose any enlargement of the national monument.

So, the possibility of incorporating a large block of land west of the present national monument boundary into the system was bound to meet with opposition, although the move has yet to be made.

"There's nothing happening," said Jim Taylor, director of the Col-

orado National Monument. "The funds for a study are before Congress."

Although the funds will probably be approved, the process won't begin for at least a year.

"We've got to find out what's in the best interests of everyone involved," Taylor said. That includes the ranchers that use the land for grazing, tourists, hikers, campers and, most recently, the hunters of the desert bighorn sheep.

The idea is to include portions of land that surround Rattlesnake and Pollack canyons west of the monument into the current boundaries. It could also mean changing the designation of the area from national monument to national park.

According to park officials, it could mean additional tourist dollars into the area.

Currently the nearly 74,000 acres of the Black Ridge Canyons Wilderness Study Area is controlled by the Bureau of Land Management. The BLM has recommended that the region be designated a wilderness area, while the DOW and the Bighorn Sheep Society supports that designation.

The Daily Sentinel

The Sentinel's editorials

BLM can't please everyone

Time was when many people considered the land over which the Bureau of Land Management has stewardship wasteland, good for little more than selling to private buyers. But times change.

As the nation's largest landlord, the BLM now finds itself in the middle of a contentious dispute over a study it's expected to complete this year of some 25 million acres of public land in the West. The study will recommend what portions of the land should remain open to mineral exploration and development and which should be forever closed to development.

The 1976 Federal Land Policy and Management Act gives the BLM until 1991 to recommend to Congress which parcels the agency thinks deserve wilderness designation. It is expected the BLM will recommend that 11 million acres be set aside as wilderness, including about 400,000 acres in Colorado. Thus far the debate over the proposals has been low key in Colorado, unlike in Utah and California. But that may change.

"For every phone call I get from an environmentalist who wants to know why we're allowing gas and oil exploration in an area, I get a call from someone who asks 'Why do you keep closing up areas,'" John Singlaub, BLM Grand Junction Resource Area manager said recently. "With wilderness, you can never please everybody."

He's got that right. It is the

BLM's blessing — and misfortune — to be charged with making these tough decisions in regions like the Colorado Plateau, which is home to some of the world's most remote, beautiful and unique desert canyon country as well as some of the planet's richest fossil fuel and mineral reserves. The Little Bookcliffs wilderness study area outside Grand Junction is a perfect example. It contains both strikingly rugged cliff country and an abundance of potentially valuable hydrocarbons.

It's expected in the case of the Little Bookcliffs that the hydrocarbons will win out over the cliffs, whereas in the case of a canyon on the Yampa River in northwestern Colorado, the agency is expected to recommend for wilderness designation a parcel that would preclude development of a dam thought to hold much potential for the area economy.

It's taken the BLM nearly 14 years of study to arrive at its recommendations, which thus far appear to be based on the sound principle of multiple-use land management. These vast tracts of land are a precious national resource, and it would be foolish to ignore their value as wilderness. It would be equally foolish, however, to permanently preclude development of the vast oil and mineral potential locked within them. The BLM, to its credit, has recognized the need to achieve a balance between these competing values.

The Daily Sentinel

DATE 6/27/89

GRAND JUNCTION DISTRICT OFFICE BUREAU OF LAND MANAGEMENT

Soaking doesn't drown rafter's dreams of river

Editor's note: Monday was the ninth day of staff writer Heather McGregor's 14-day raft trip from the Gunnison Gorge to Moab, Utah. She and her guests went from Loma to Rabbit Valley.

Heather McGregor
Daily Sentinel

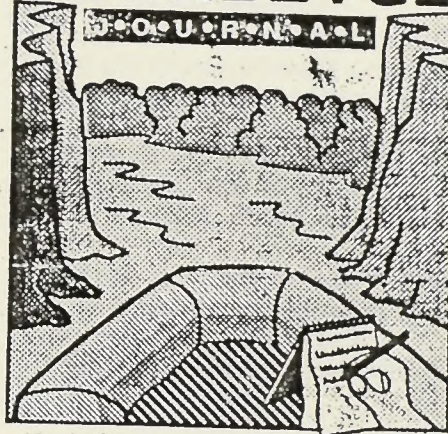
RABBIT VALLEY — Mike Perry started out dry and ended up in the drink Monday, but that didn't drown his enthusiasm for the museum of the Colorado River.

"This is the museum," he said, spreading his arms wide, taking in the river from Grand Junction to Rabbit Valley, a mile into Utah.

"It's a lot more than a building to house relics."

Perry, 43, directs the Museum of Western Colorado, headquartered

Downriver



in Grand Junction.

He envisions the museum as a necklace of jewels spread through the Grand Valley, linked by the thread of the Colorado River, much like the Grand Junction/Mesa County Riverfront Project.

From the other side of the raft, Mary Nelson added, "There is a grand design. It's not simply accidental these projects are overlapping and entwining."

Nelson, 38, director of United Way of Mesa County, has watched the riverfront and the museum, Kokopelli's Trail and the Black Ridge Conservation Area gain momentum.

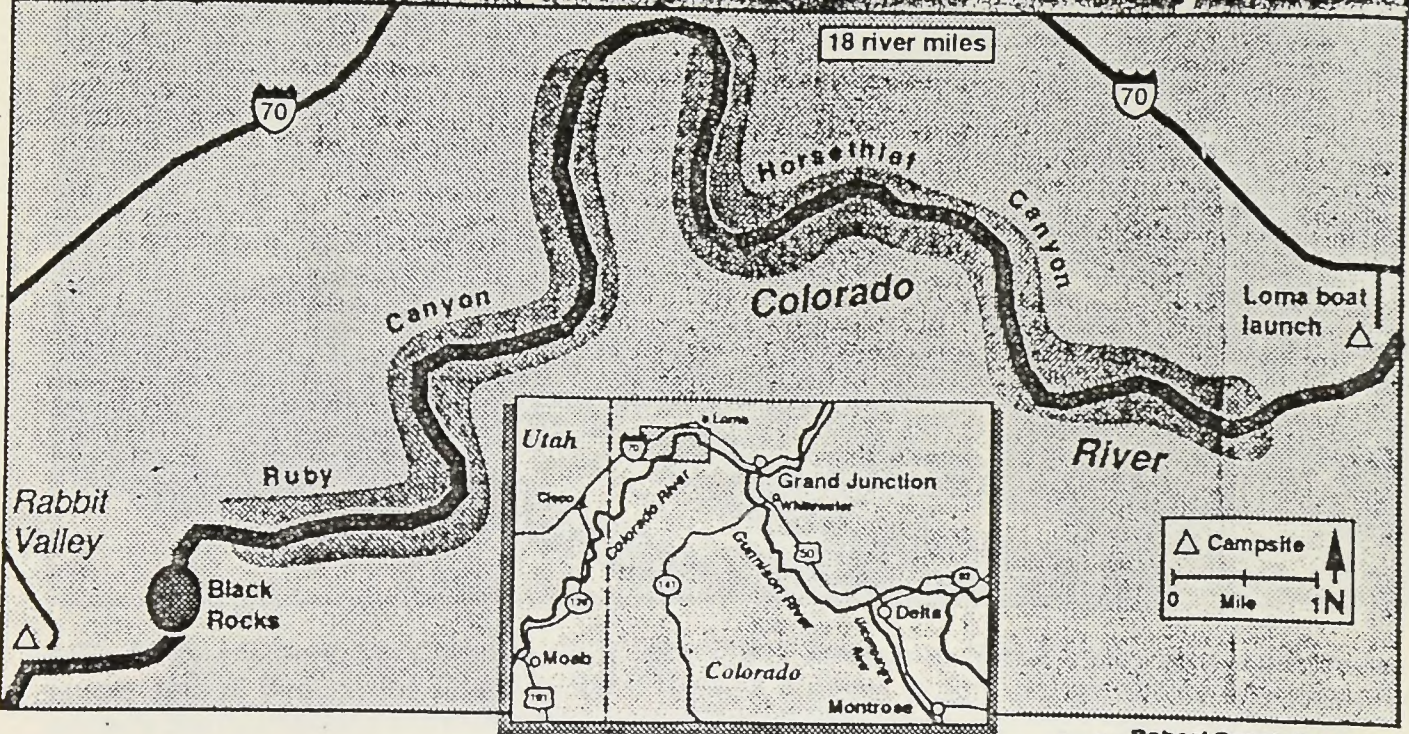
An avid outdoorswoman and energetic community leader, Nelson sees positive change in the valley, as new emphasis is put on an economy that isn't environmentally damaging.

"That's part of our mission," Perry said of the museum's goals.

"You're in an ideal situation to promote that philosophy," Nelson said.

Later Monday, Perry found him-
Please see Journey, page 2.

Day 9 - Ruby-Horsethief Canyons



Robert Garola/Daily Sentinel

Journey

From Page One

self in a less-than-ideal, but somewhat comical situation.

He and Daily Sentinel photographer Al Gibes spent much of the afternoon paddling in a two-person inflatable kayak, a normally bouyant and forgiving boat.

They stopped at a side canyon to view some pictographs — old Indian paintings on a sandstone wall — and fell behind the raft.

Their only problem was a slow leak in the left side tube of the kayak. A couple of miles downstream from the side canyon, they tipped precariously as the tube lost pressure.

Gibes went in the river first, and Perry followed. From there, they bobbed another mile down the river in their life jackets, laughing and telling jokes.

Visitors to our camp in Rabbit Valley pulled them out of the river. The two reported the adventure was "lots of fun."

Rabbit Valley is a key spot for the museum, cutting down through

the Morrison formation of red and green-gray bentonite, which is a volcanic ash.

It's the layer loaded with dinosaurs and other fossils.

Perry envisions a paleontology research center, more trails, more dinosaur quarries, and working with the U.S. Bureau of Land Management in the hoped-for Black Ridge Conservation Area.

"People with vision are so interesting, the fact that they can dream things into being," said Nelson.

"They're often considered zealots by their peers, because of their focus and intensity."

Perry makes no attempt to hide those attributes when it comes to dinosaurs and other natural history.

"We took out a stegosaurus there last year that was 75 percent complete. We figure it weighed 8 to 12 tons.

"These were big animals. Imagine an environment that supported that kind of life," Perry said.

"You know, people ask why the

dinosaurs failed and died out. But scientists are now asking why they were so successful in adapting to a changing environment for 100 million years."

In contrast, humans have been around for about 4 million years, he said.

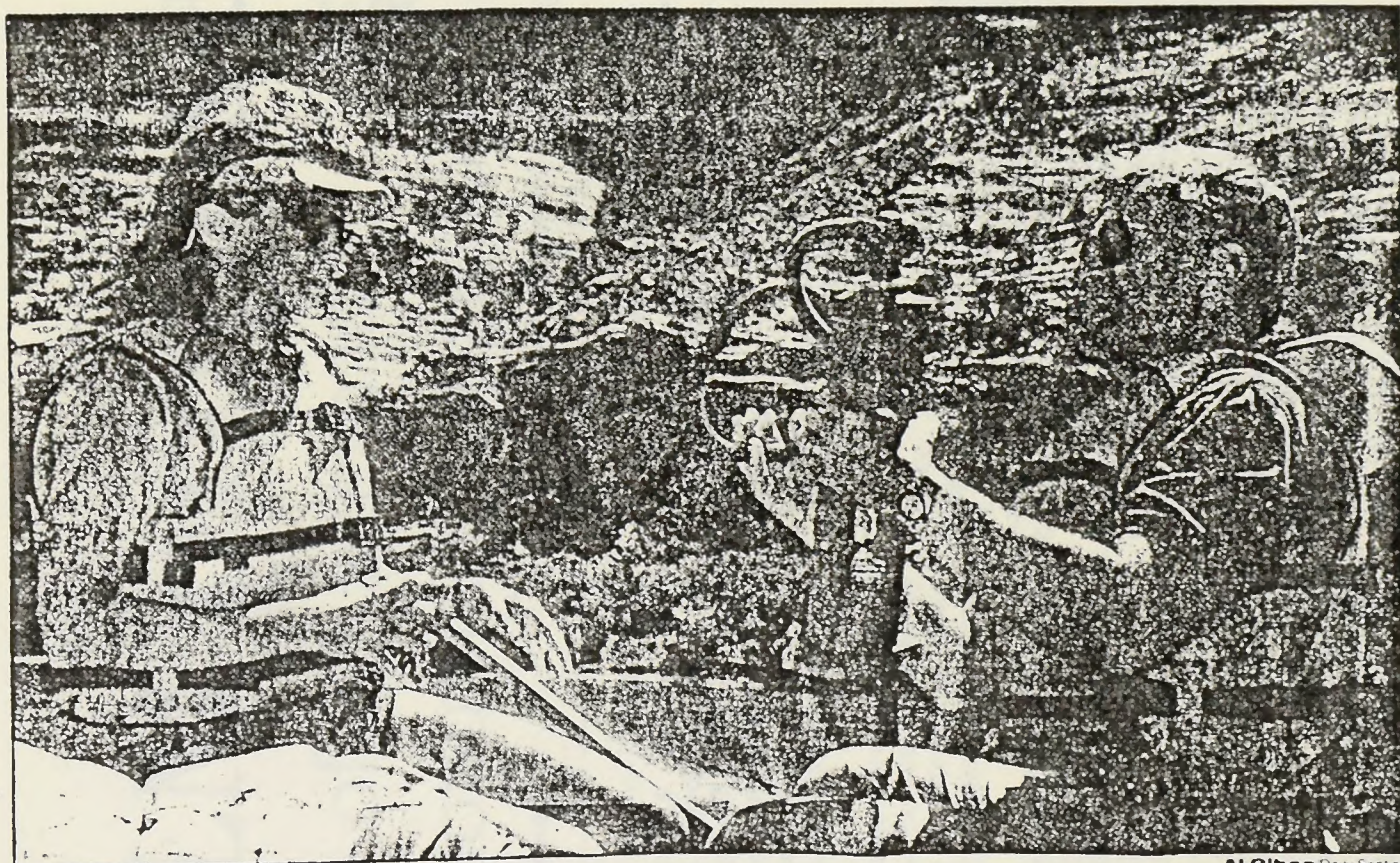
But humans like the Fremont Indians, who lived along the Colorado River at the time of the Anasazi, were successful, too, he said.

"They were masters at their environment. Every plant you see had a use, for medicine, shoes, clothing, even diapers, made from the soft inner bark of the juniper tree."

Nelson found similar success in the cliff swallows, which continually swooped inches over the river as we floated along under deep red sandstone cliffs.

"See those swallow nests clinging under the cliff? They're seeming to defy gravity," she said.

Perry replied, "Everything you see in the desert is so well adapted."



Al Gibes/Daily Sentinel

Mike Perry envisions the Colorado River from Grand Junction to Rabbit Valley as a museum linking jewels spread through the Grand Valley. "There is a grand design. It's not simply accidental these projects are overlapping and entwining," agreed Mary Nelson, Perry's boating partner for the day.

DATE

6/4/89

GRAND JUNCTION DISTRICT OFFICE BUREAU OF LAND MANAGEMENT

BLM proposes land merger

Area offers alternative to monument expansion

Bob Silbermangel
Daily Sentinel

Dinosaur digs in Rabbit Valley and Kokopelli's bicycle trail, Rattlesnake Canyon and the Black Ridge Canyons Wilderness Study Area all could be included in one national conservation area, a U.S. Bureau of Land Management official says.

Such an area, more than 100,000 acres, would be administered by the BLM as an alternative to expansion of the Colorado National Monument.

It would maintain multiple use on the public lands, including grazing and hunting, while increasing public attention and use of the lands. A conservation area also could command a larger chunk of BLM funding, said Bruce Conrad, district manager for the BLM in Grand Junction.

"I think this is being really responsive to the public," Conrad said. Local BLM officials will take information on the proposed Ruby Canyon National Conservation

Area to Washington this month.

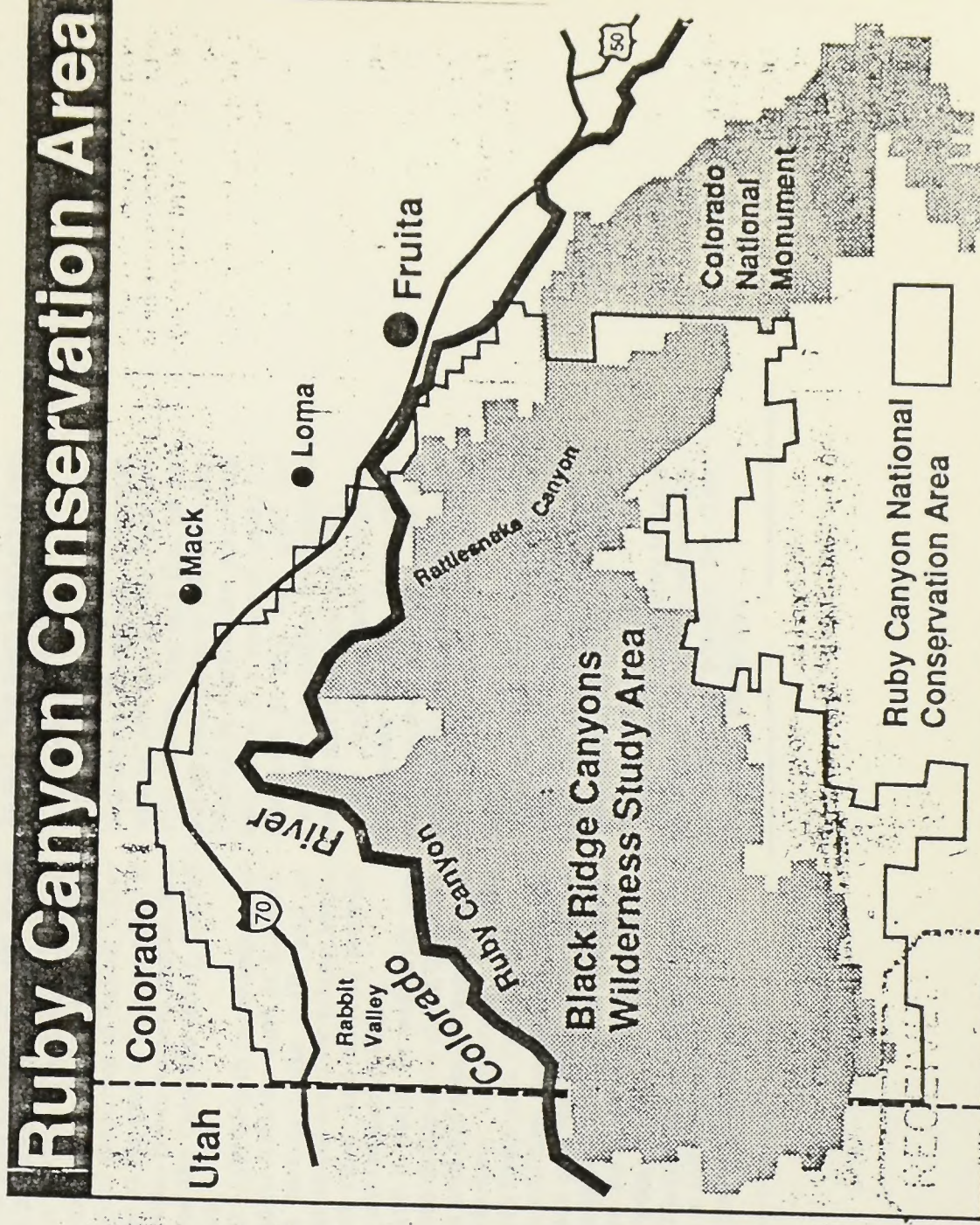
"We're putting together a package and we're going to talk to anyone who will listen," Conrad said. "I think everyone's excited about it except possibly the National Park Service. They'd like to see it become a park."

At the direction of Congress, the Park Service held public hearings in January about expanding the Colorado National Monument to include the 64,000-acre Black Ridge area and perhaps some of the Colorado River. The expanded national monument could then be designated a national park.

Public comment from ranchers to miners to hunters to environmentalists was against expansion of the monument. Most people at the meetings said they preferred to see it left under BLM jurisdiction.

Jim Taylor, superintendent of the Colorado National Monument, said the Park Service is writing a draft report of various alternatives developed as a result of the public meetings.

Please see Black Ridge, page 5A



Black Ridge-

From Page One

The draft is expected to be available to the public by late July, with public hearings planned for August.

Although the BLM proposal for a national conservation area came up only last month, and was not discussed in the public meetings or in the BLM's own resource management plan, the proposal will be included in the draft of alternatives, Park Service officials decided last week, Taylor said.

Conrad can speak with experience about BLM national conservation areas. He wrote the plan for the first one, the 60,000-acre King Range National Conservation Area on the coast of northern California in 1970.

Since then, four others have been designated by Congress, none of them in Colorado.

"A lot of people at first thought it was just lines on a map," Conrad said of the King Range. "But it allowed us to do more things, and to get more money for management."

The King Range includes every-

thing from wilderness seacoast to timbering, he said, with a very specific plan on how each use would be allowed and managed.

A similar plan here could give greater protection to the paleontological resources of Rabbit Valley and as far east as Dinosaur Hill at Fruita, and to ancient Indian sites near the Colorado River, Conrad said.

It could help in improving recreational facilities such as Kokopeli's mountain-bike trail, and in ironing out areas for hiking, horseback riding and off-road vehicles in parts of Rabbit Valley.

And it would fit well with proposed designation of the Colorado as a wild and scenic river and with wilderness designation for the Black Ridge area, Conrad said.

In addition, the national conservation area would bring the kind of recognition to the area that some hope would come with a national park designation.

"There was a lot of increased usage in the King Range" after it was designated, Conrad said.

"This is the way I see we can respond to what the public wanted," he said. "We allow a variety of uses in areas that qualify, and wilderness in others."

Third District Congressman Ben Nighthorse Campbell, D-Ignacio, who helped initiate the Park Service studies, has said that he has put on hold plans to introduce legislation to expand the monument and make it a national park. He also said he will wait until the Park Service studies are complete before making a final decision.

Dee Jacobson, who works in Campbell's Western Slope office, said Campbell has yet to see the national conservation area proposal, but he is to be briefed on it soon.

She said the BLM proposal provides a good back-up plan in the event the expansion of the monument and designation as a national park prove unfeasible.

"I just want each agency to come up with as much information for the public as possible for their proposals," she added.



CROSSING: Cyclists pass near a river along scenic Kokopelli's Trail. Bureau of Land Management / O. Munin

Kokopelli's Trail draws cyclists for ride across 'best of the West'

By Joanne Diltner
Denver Post Staff Writer

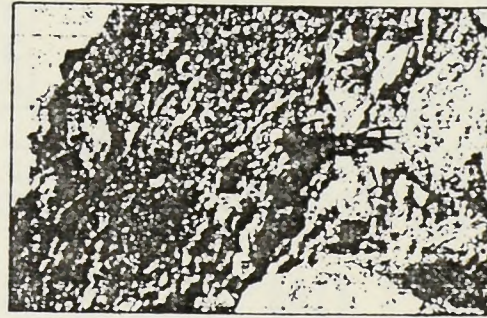
GRAND JUNCTION — Kokopelli, the Hopi Indians' legendary hump-backed flute player who wandered across the Colorado Plateau through the centuries, would be in agreement with modern mountain bikers about the new bike trail here.

"It's a route through paradise," said Carlos Sauvage of the trail that winds from river valley to steep desert cliffs, 128 miles from this Colorado city to Moab, Utah, and covers elevations ranging from 4,400 to 8,500 feet.

Because it wanders through so much world-class beauty, it has been dubbed "Kokopelli's Trail" by the hundreds of volunteers who worked this spring to make the route a reality.

The magical being, Kokopelli, is a favorite among many Native American groups. They believe he traveled from village to village with a bag of songs on his back and was able to drive back winter with his flute playing. A symbol of fertility, Kokopelli was welcomed during spring planting. His image is seen in Anasazi figures painted on walls and pottery as well as in contemporary artwork.

Getting the mountain bike trail built and linked to existing



ROCKY: Timms Fowler makes his way down the trail.

four-wheel drive roads in just a few months was almost as miraculous as Kokopelli's feats. Devoted mountain bikers, non-bikers who wanted to work on something positive, and employees of government agencies and private businesses all pitched in to build Kokopelli's Trail on the Colorado Plateau.

Hewing the trail across red rock mesas in desert conditions, threading along river gorges and

through aspen-covered mountains would be hard work for most people. Just considering traveling the route by bicycle exhausting for the non-biker. I not for the enthusiasts.

"Building the trail was more fun than a person should be allowed to have," declared Tim Fowler, coordinator for the trail project. Fowler, a Grand Junction attorney, and Sauvage, a Bureau of Land Management outdoor recreation planner, hatched the idea for the mountain bike trail when they were looking at area maps and talked about the numerous old dirt roads.

Mountain biking — pedaling non-motorized bicycle with fat knobby tires and upright handlebars — is one of the nation's fastest-growing sports. Estimates are that it is doubling every year, as is use of ATVs — all-terrain vehicles — but mountain bikes are not accused of damaging the environment the way ATVs do, primarily because ATV riders often go off trails cross-country.

Sauvage said there may be 2,000 people a day on Moab's famous Slickrock Trail, a renowned mountain bike challenge, but there also are thousands of mil

Please see **TRAIL** on 4

Kokopelli's Trail marvel of volunteerism

TRAIL from Page 1 C

et trails where you may see only one other person all day. The appeal is both in the challenge of the exercise and in seeing remote and beautiful countryside while covering more territory than hiking.

"It's your power, getting you up the hill and down," Fowler explained.

In the past two years, Sauvage has received call after call requesting information on where to go mountain biking, and how to create "neat trips" for bikers. Now he has a way to make trip planning easy for mountain bikers: the newly completed free map of Kokopelli's Trail that shows the trail and its links to existing roads and trails. And it includes the admonition to "Bring water, lots of water," since it is not available on this high desert trail.

The BLM is a relative newcomer in the recreation field compared to the U.S. Forest Service, but the bureau's cooperation on this project was wholehearted. BLM staff members helped on the reconnaissance for the trail and its linkages, and prepared the environmental assessment.

Volunteers from age 8 to 68 worked on the trail. Bicycle shops from Grand Junction to Moab provided a network of people willing to contribute hard labor to the task. Much of the work was accomplished over four weekends in which 200 to 250 volunteers labored. The most challenging part involved construction of 11 miles of the trail across untouched land. All of the volunteers received hats and a "Golden Spoke" at the May 6 dedication.

'This bike trail, you go down it and there's dozens of roads, each one more inviting and rewarding than the last.'

Carlos Sauvage, BLM

Many of the volunteers weren't bikers when they started, but got a mountain bike as work proceeded so they could go out and enjoy the trail, too.

Hopi Indians from the Flute Clan at Keams Canyon, Ariz., came to the dedication, and blessed Kokopelli's Trail, using turkey feathers for the wisdom and intelligence to know what to do, eagle feathers for the strength and endurance to do what should be done, and corn to symbolize Mother Earth.

The trail was designed to meet a variety of needs. Near Grand Junction it curves a figure 8 where each loop is 8 miles, so that riders can come after work or on weekends for short workouts. But other places are so remote that the people doing maps and signs got lost several times. There now are signs every half-mile and at all intersections so bikers know where they are all times.

"This bike trail, you go down it and there's dozens of roads, each one more inviting and rewarding than the last," Sauvage said. "You have to earn your rewards."

"Mountain bikers want to get outside, have exercise, cover more country than hiking," Fowler added. "You see country you wouldn't see in the city, it's fun, low cost, available to low-income people, and helps the area's economy, too."

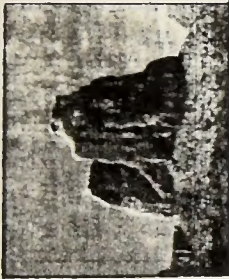
The pair are elated over the response to Kokopelli's Trail, and compare it to the Colorado Trail (a 480-mile hiking path from Durango to Denver completed last year) and the "true granddaddy of 'em all," the Appalachian Trail.

The Kokopelli trail is composed of the best of the West: desert country, spectacular vistas with a great sky overhead, and the ingenuity and hard work of dedicated people.

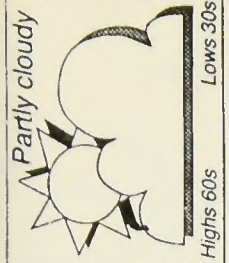
"Some people like to get their exercise in health clubs," Sauvage offered. "But that's a claustrophobic environment. Here on Kokopelli it's so quiet."

"Except when you're panting," Fowler added.

The free map for the 128-mile Kokopelli's Trail includes a narrative description of the route and an elevation chart. To obtain a copy, send a self-addressed, stamped envelope to the Colorado Plateau Mountain-Bike Trail Association (COPMOBA), P.O. Box 4602, Grand Junction 81502; or to Bureau of Land Management, Grand Junction Resource Area, 764 Horizon Drive, Grand Junction 81506, phone 234-6561; or to the Bureau of Land Management, Grand Resource Area, P.O. Box M, Sand Flats Road, Moab, Utah, 84532, phone 801-259-8193. Bicycle shops in Grand Junction and Moab also have the map.



The Daily Sentinel



October 23, 1989

Grand Junction, Colorado — Vol. 97, No. 327

25¢ newsstand — 20 pages

Monument growth report raked

Bob Silbernagel
Daily Sentinel

The report on proposed expansion of the Colorado National Monument is full of mistakes, inaccurate language and a bias toward the National Park Service, a U.S. Bureau of Land Management official said.

Another critic condemned the report and called for a full-blown environmental study.

But 3rd District Congressman Ben Nighthorse Campbell, D-Ignacio, who requested the study, said it seems to accomplish what he asked the Park Service to do.

On Oct. 6, the Park Service released reports on proposed expansion of both the Colorado National Monument and the Black Canyon of the Gunnison National Monument.

The reports stopped short of recommending expansion of the two national monuments, but in both cases they said there is "strong justification" for the monuments to become national parks if they are expanded.

The reports examined several alternatives in each case.

For the Colorado National Monument, those alternatives in-

Please see Park, page 6A

Park Service 'sheepish' after letter

Bob Silbernagel
Daily Sentinel

National Park Service officials in Washington, D.C., say they have no position on whether Rocky Mountain bighorn sheep should be introduced to the area in which the Colorado National Monument might be expanded.

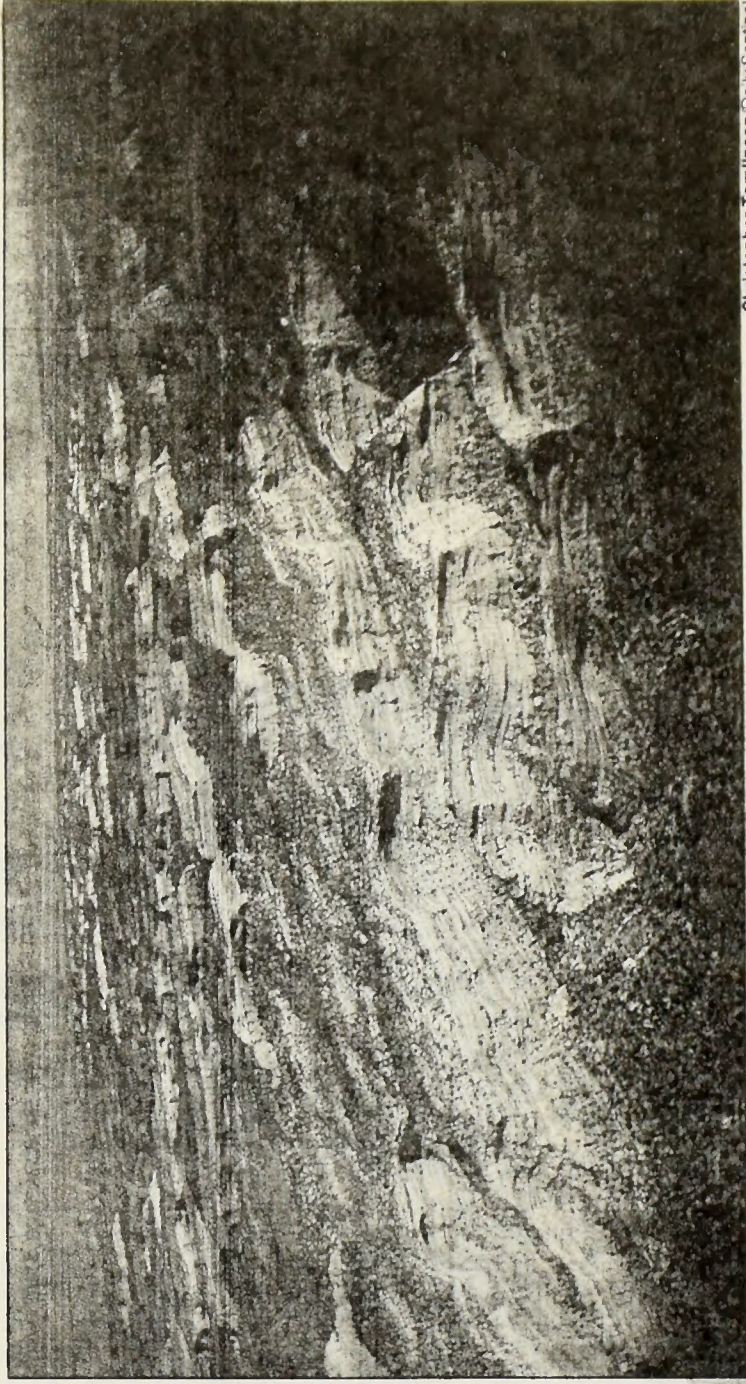
They're a little late.

The bighorn sheep were introduced into the area 10 years ago.

The Park Service position was stated in a Sept. 19 letter to Daryl Iser, a Grand Junction member of the Rocky Mountain Bighorn Sheep Association and a vocal opponent of the monument expansion.

The letter did little to boost Iser's confidence in the Park Service.

Please see Letter, page 6A



Christopher Tomlinson/Daily Sentinel

An aerial photograph shows the proposed expansion area near the east to Grand Junction. A Park Service report stops short of recommending expansion of the national monument.

Park

From Page One

clude:

- ✓ Expanding from about 20,000 acres to 97,700 by including the Black Ridge area up to the south shore of the Colorado River.

- ✓ Expanding to about 104,000 acres and take in a 21-mile section of the Colorado River.

- ✓ Leaving the Black Ridge under the jurisdiction of the BLM, with the possibility it could become wilderness.

- ✓ Leaving surrounding lands under BLM jurisdiction and consider designating them as a national conservation area or national recreation area.

Daryl Iser of the Rocky Mountain Bighorn Sheep Association fumed that the Park Service report says little about the sheep herd, except to say that the alternatives for expanding the monument "will include most of the area identified as desert bighorn sheep range. Sport hunting would be prohibited unless specifically provided for through legislation."

"They just sidestepped or ignored issues they can't answer," Iser said. "The report is a sham."

The report has some mistakes in it and a bias toward the Park Service, said John Singlaub, Grand Junction area manager for the BLM.

For instance, he said, the Park Service report forecasts increased tourism under the alternatives that would expand the boundaries of the Park Service. "They don't show any gain under BLM management, and that's utter nonsense," Singlaub said.

Jimmy Taylor, superintendent of the Colorado National Monument, said the alternative of existing BLM management "seems to us to be the status quo" so no tourism

Meetings

Colo. National Monument

- ✓ Nov. 14, 7 p.m., Glade Park Community Center.

- ✓ Nov. 15, 7 p.m., Fruita Monument High School.

- ✓ Nov. 16, 7 p.m., Grand Junction City/County Auditorium.

- ✓ Written public comments due Nov. 24. Mail to: Superintendent, Colorado National Monument, Fruita 81521.

Black Canyon

- ✓ Nov. 8, 7:30 p.m., Delta, Colorado Bank & Trust Annex.

- ✓ Nov. 9, 7 p.m., Montrose, Colorado-Ute Conference Center.

- ✓ Written public comments due Nov. 20. Mail to: Superintendent, Black Canyon of the Gunnison National Monument, P.O. Box 1648, Montrose 81402.

gain is shown.

"For us, we showed a fairly conservative estimate of what might happen — an increase of about 2½ percent — which is not much more than we've seen in the monument the last few years," Taylor said.

But BLM documents show use of the area already growing by at least 5 percent annually with even greater growth in mountain biking and off-road vehicle use in some areas that would be included in the National Conservation Area.

The BLM's description of how it manages the land, and how it would in the future, is significantly different, according to a document submitted by the BLM.

Letter

From Page One

Not only did the letter show ignorance of the bighorn sheep transplants into the Black Ridge area, but it told Iser of the draft study "which has been released for public review."

That was nearly three weeks before the Park Service report on expansion alternatives was released for public review.

The letter was signed by James W. Stewart, for Denis P. Galvin, associate director for planning and development for the Park Service.

Jimmy Taylor, superintendent of the Colorado National Monument, said he had no idea how the Park Service could have missed so badly on the bighorn sheep issue, but said that he would have corrected the letter if he'd seen it before it was mailed.

Stewart's letter was written with the expectation that the Park Service report would be released on time, but the report apparently was late because of the printing schedule, Taylor said.

Iser said he has a lot of respect for Taylor. "He's a real gentleman."

But the Park Service as a whole "has done nothing more than outrage people" by being as out of touch as the letter appears, he said.

The letter also informs Iser that "expansion of the Colorado National Monument does not appear to be a highly controversial issue."

But hearings held by the Park Service last January drew packed houses, with the majority of people opposed to expansion.

Taylor said that officials in Washington, D.C., have only received the report this month, just as people here.



DUPLICATE
(COURTESY COPY)

COLORADO CATTLEMEN'S ASSOCIATION

SUITE 220 LIVESTOCK EXCHANGE BUILDING / DENVER, COLORADO 80216 / TELEPHONE (303) 296-1112

June 30, 1989

J. R. E. C.

MEMO

TO: Ag Media, Industry Trade Associations and
Colorado State Officials

FROM: Reeves Brown, CCA Executive Vice President

SUBJECT: Resolutions/Directives adopted at 1989 CCA Convention

RECEIVED
SEP 06 1989

For your information, I am sending you a copy of the Resolutions and Directives which were adopted at the 1989 CCA Annual Convention in Durango, June 14-16. The Resolutions are incorporated as formal Association policy while the Directives serve as action statements for the various CCA committees and staff.

Please contact our office if you should have any questions regarding this information or any of the convention activities.

Thank you for your continued support of the Colorado Cattlemen's Association.

RECEIVED

SEP 11 1989

AA

RESOLUTION

COLORADO CATTLEMEN'S ASSOCIATION

COLORADO NATIONAL MONUMENT EXPANSION

WHEREAS, the proposed expansion of the Colorado National Monument could eliminate livestock grazing; and

WHEREAS, the effect on livestock grazing could cause both economic hardship and a deteriorating range resource; and

WHEREAS, projected costs of park service management is far in excess of BLM management,

THEREFORE BE IT RESOLVED, that the Colorado Cattlemen's Association oppose such expansions that restrict the multiple use concept.

STATE OF COLORADO
Roy Romer, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

Perry D. Olson, Director
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 297-1192

REFER TO:



RESOLUTION

WHEREAS, the Division of Wildlife has spent considerable sums of money establishing Colorado's first desert bighorn sheep herd.

WHEREAS, there has been concern expressed over the Division of Wildlife losing the wildlife management options over the range of this herd.

WHEREAS, the Bureau of Land Management has proposed a management alternative that would protect all management options in perpetuity.

WHEREAS, there has been substantial support expressed by the public for the Bureau of Land Management's alternative for management of the land west of Grand Junction and south of the Colorado River.

NOW THEREFORE BE IT RESOLVED, that the Colorado Wildlife Commission and the Colorado Division of Wildlife support the Bureau of Land Management's proposal to establish the Ruby Canyon National Conservation Area.

DATED: 7-14-89

SIGNED: George VanDenBerg

Chairman

Perry D. Olson
Director

DEPARTMENT OF NATURAL RESOURCES. Hamlet J. Barry, Executive Director

WILDLIFE COMMISSION, George VanDenBerg, Chairman • Robert L. Freidenberger, Vice Chairman • William R. Hogberg, Secretary
Eldon W. Cooper, Member • Rebecca L. Frank, Member • Dennis Luttrell, Member • Gene B. Peterson, Member • Larry M. Wright, Member



THE WILDERNESS SOCIETY

February 17, 1989

FEB 21 1989

Mr. John Singlaub, Area Manager
Bureau of Land Management
746 Horizon Drive
Grand Junction, Colorado 81502

Dear John:

First, my apologies for this long overdue thank you for meeting with Kirk Koepsel and me on the morning of the Colorado National Monument public hearing. As you will note by the date on the enclosed letter to Jim Taylor, I've been a little behind on all my correspondence, owing to a recent rush of activity around here on a proposal for a new Colorado forest wilderness bill. I enjoyed meeting you and getting a sense of your views of the park expansion studies; your willingness to openly discuss your concerns certainly provided me with a better understanding of the issues at hand.

I thought you'd be interested in a letter from Kirk and me to Senator Wirth and Congressman Campbell, asking them, as sponsors of the original appropriation legislation, to look into the funding for the studies and the National Park Service's "fast tracking" of them. I've enclosed a copy of it for your files. We have not received any response as yet to our request for a GAO investigation; we'll let you know what transpires.

Thanks again, John, for your time last month. I hope that our ability to find common ground on this issue will enable us to work more closely with the Grand Junction Resource Area office on other matters of mutual concern in the future.

Sincerely,

Christine Sanborn
Regional Associate

enclosures

CENTRAL ROCKIES REGION

777 GRANT STREET, SUITE 606, DENVER, COLORADO 80203

303 839 1175



THE WILDERNESS SOCIETY

February 14, 1989

Mr. Jim Taylor, Superintendent
Colorado National Monument
Fruita, Colorado 81521

Dear Jim:

As promised, following are The Wilderness Society's more detailed comments on the National Park Service's plans to explore the expansion and redesignation of Colorado National Monument. But first, please accept my thanks for the time you spent with Kirk Koepsel and me on the afternoon of the Grand Junction hearing. Your concern for the protection of the resources within and adjacent to the national monument were quite apparent during our discussion and we appreciated your candid observations. Kirk and I came away from our meeting feeling that each of us had a much clearer understanding of the others' views and that our disagreement centers mainly on process and not on the purpose of the park service's study.

Our primary concern, of course, is that this study is proceeding on a fast track under a "categorical exclusion" determination which apparently allows the park service to conduct its analysis without full public participation and development of the preferred alternative that the National Environmental Policy Act of 1969 mandates. We believe this will have a serious and detrimental impact on the park service's efforts -- without full disclosure of the agency's professional opinion (that should, theoretically, be contained in a preferred alternative), where is the opportunity for the Congress or the public to judge the efficacy of one alternative or another?

It seems to us that good public policy evolves out of informed discussion among all parties concerned, and this is impossible when the National Park Service is less than forthcoming with its expert analysis of a situation such as we have here. The public has a right to expect that its federal agencies will conscientiously and fairly analyze all facets of a particular proposal and then make a recommendation based on that analysis. But the study of the Colorado National Monument will not, according to Wayne Gardner's description at the public hearings, provide such a recommendation. However, our conversation with you and Mr. Gardner clearly left the impression that the park service will privately make its opinions known to the Congress, although the public will remain in the dark. We find the park service's position on this to be both untenable and unacceptable.

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Mr. Jim Taylor
Page Two
February 14, 1989

We quite firmly believe that nothing less than a full environmental impact statement prepared in accordance with NEPA's requirements is not only appropriate but necessary. The scope of the study the park service has undertaken includes issues which are important not only to the federal land managers and local communities but to the nation. The agency will consider not just the expansion of a national monument onto other federal lands which will bear certain impacts from that expansion, but also the monument's "promotion" to national park status, a decision of no small consequence for the state of Colorado or the thousands of Americans across the country who care about our national parks. Why would the park service not want full public participation in this decision-making process?

As to the substantive issues, there are a number of concerns that we believe the study should consider. Primary among them is how management of the Black Ridge Canyon WSA will be affected by transfer from the Bureau of Land Management to the National Park Service. As stated in our public hearing testimony, it is not so much our concern for the uniform worn by the manager as for the protection of the land and its resources that we question the wisdom of such a transfer. We believe the BLM has done a remarkable job in managing the Black Ridge area as wilderness, and it has earned well-deserved recognition from Colorado conservationists for its good work.

We accept on faith your expressed desire that the Black Ridge WSA should continue to be managed as wilderness, but we wonder what benefit is to be obtained by removing it from BLM jurisdiction and placing it under the park service's flag? There are significant differences in wilderness management between the two agencies -- notably hunting and grazing restrictions -- that must be addressed to the satisfaction of the public. You personally expressed concern about the amount of grazing that would continue on the land under BLM management, yet admitted that park service control offers no guarantee that it will be eliminated (consider the Capitol Reef experience). Similarly, we are troubled by the agency's propensity for acquiescing to concessionaires' avarice and the demands of a car-dependent public; what guarantees do we have that a decision will not be made at some point after transfer that the influx of tourists to the "new" park requires construction of roads into the Black Ridge area to accommodate them rather than maintaining the WSA's wilderness character for those who enjoy encounters with primitive nature?

How will park service jurisdiction affect management of and access to the Colorado River in the Black Ridge WSA? What of the big horn sheep reintroduced in the WSA through the cooperative efforts of the BLM and the Colorado Division of Wildlife?

The assertion that the BLM's budget may not permit it to provide the administrative and technical resources necessary to manage and protect Black Ridge as a wilderness demonstrates peculiar logic. It is poor justification for removing the WSA from the BLM's management and adding it to the

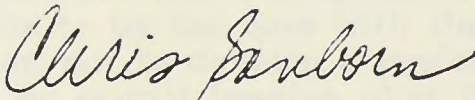
Mr. Jim Taylor
Page Three
February 14, 1989

national monument. Instead, the Department of the Interior should be looking at ways to place more funds in the BLM's wilderness management budget to encourage its resource protection, rather than resource extraction, activities. The BLM's performance in managing Black Ridge Canyon deserves greater support from the department and the public, and should not be "punished" for its efforts to preserve the WSA's natural values by losing the area to the park service.

Finally, we wish to suggest that, while the addition of Black Ridge Canyon WSA might indeed increase Colorado National Monument's suitability for national park status, it may not fulfill the stated criterion of improving the representation of natural ecosystems in the park system. We note that eight monuments and parks on the Colorado Plateau contain many of the same geologic, archaeologic, cultural and historic values found in Colorado National Monument. How does another national park with virtually identical properties improve the park system?

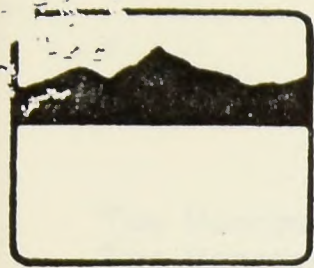
The Wilderness Society is pleased to provide these comments for your thoughtful review. We believe the concerns we have raised here should prompt the National Park Service to reconsider the role which the public will play in the on-going study of expansion and redesignation of Colorado National Monument. It is clear that without preparation of an environmental impact statement and the development of a preferred alternative, that role is severely and inappropriately restricted. We hope that the park service will recognize the validity of these concerns and reassess its position.

Sincerely,


Christine Sanborn
Regional Associate

xc: Wayne Gardner, Landscape Architect
NPS Regional Office, Denver

Steve Whitney/Brien Culhane
The Wilderness Society, D.C.



colorado
environmental
coalition

777 Grant Street, Suite 606
Denver, Colorado 80203-3518

February 10, 1989

The Honorable Timothy E. Wirth
United States Senate
1129 Pennsylvania Street
Denver, CO 80203

The Honorable Ben Nighthorse Campbell
United States House of Representatives
115 North Fifth Street, Suite 520
Grand Junction, CO 81502

Dear Senator Wirth and Congressman Campbell:

The Colorado Environmental Coalition and The Wilderness Society were distressed to learn that the National Park Service has no intention of complying with the National Environmental Policy Act of 1969 (NEPA) in its boundary expansion/redesignation studies for Colorado National Monument and Black Canyon of the Gunnison National Monument. We are bringing this matter to your attention because you both sponsored the legislation that appropriated money for these studies in the last session of Congress.

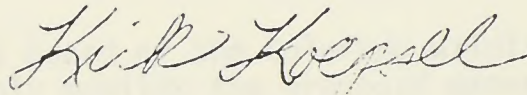
The National Park Service claims its regulations permit usage of a categorical exclusion, obviating the need for NEPA compliance, when no "decisions" are being made, as it holds to be the case with these studies. We believe the Park Service has chosen not to develop a preferred alternative in order to evade NEPA compliance. We cannot imagine what this study will accomplish if no preferred alternative is presented. The congressional delegation will be unable to gauge either public sentiment toward or the agency's professional analysis of expansion and redesignation of these areas. Proper impact analysis of alternatives that are developed may not occur either, since the Park Service need not concern itself with NEPA's requirements. Even more disturbing to us is that representatives of the agency stated that they would be willing to share with the congressional delegation their private opinions on the appropriate alternative without any sort of public scrutiny.

Under the current process scenario, a decision on expansion and redesignation will have little basis in fact, since the studies are going forward without full public participation and the opportunity for citizens to develop informed support for or opposition to a preferred alternative, as prescribed by NEPA. The agency's thinking here is beyond our comprehension. We were told by its representatives that the reason for conducting the highly abbreviated studies was that funding was not available to do a more thorough analysis. Therefore, instead of receiving a quality study, the public will end up with a virtually worthless document.

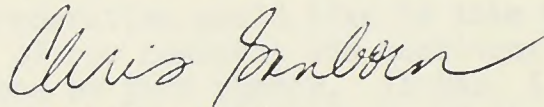
The Honorable Timothy E. Wirth
The Honorable Ben Nighthorse Campbell
Page Two
February 10, 1989

If the National Park Service persists in this evasion of the NEPA process, we strongly recommend that all funding for these studies be placed on hold until the agency reconsiders its current position. We further recommend that you jointly request a General Accounting Office investigation into the apparent disappearance of the funds that were included in last year's appropriations bill.

Sincerely yours,



Kirk Koepsel
Colorado Environmental Coalition



Christine Sanborn
The Wilderness Society

xc: Lorraine Mintzmyer

Colorado Wildlife Federation

Cathie Zarlingo
2278 Holland Avenue
Grand Junction, CO 81503

United States Department of the Interior
National Park Service
Colorado National Monument
Fruita, Colorado 81521

February 2, 1989

RE: Proposed Expansion of Colorado National Monument

Dear Superintendent,

I am representing the Board of the Colorado Wildlife Federation who have asked me to closely monitor the proposed expansion of the Colorado National Monument.

The Colorado Wildlife Federation would like to take this opportunity to express some of our concerns and questions with regard to the studies being done by your agency. It has, I might mention, been very difficult to assess the purpose of these studies without the benefit of reviewing a management plan first. Keeping this in mind the CWF hopes that you are weighing the public comments at the recent meetings throughout the area equally with the opinions that have already been formed by the National Park Service.

The CWF would like to note that the current management of these lands by the BLM has been far beyond our expectations. We feel the current citizen dollar amounts that have been invested in the area by the BLM and the Colorado Division of Wildlife for wildlife, habitat, and maintaining the delicate wilderness study designation of the area should have a significant merit in your evaluation of a need for a different style of management. The CWF would rather you realize that the impact of a status change on the area might be more detrimental than helpful. Example of this being; the critical range provided for the Desert Bighorn Sheep, mule deer, cougar, elk and other wildlife that inhabit the area. Under the BLM, the area is now under careful restrictions and management, which from the health of the wildlife populations, seems to be very good. Can the National Park Service offer the same management?

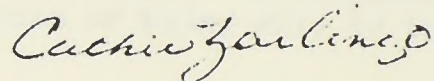
Going back again to the public's inability to input and review without seeing the actual management plan and or alternatives, it is very difficult to understand the need for the expansion of the Colorado National Monument. We feel the study areas trail access and pristine quality have great values that are being adequately met by the current management. Can the National Park Service guarantee this quality with respect to the current designation of the area?

If one of your alternatives includes portions of the Colorado River that are used by the public for water-fowl and fishing recreation, how would this be affected? Mitigation must be considered. Would the status change of the area effect the current air quality designation of the Monument? What businesses and local industry would then be affected?

The time frame for these studies to be completed seems very short, we are deeply concerned that due to this length of time for recommendations and input many important aspects will be left unanswered.

You will be receiving further written comments from the CWF as this process unfolds. We do hope that you will keep in mind that the public input should be carefully studied before the draft plan since we are the ones that these designations are ultimately going to effect.

Respectfully,



Cathie Zarlingo

cc: Congressmen: Ben Nighthorse Campbell
Tim Wirth
William Armstrong
CWF Board of Directors

STATE OF COLORADO
Roy Romer, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

Perry D. Olson, Director
6060 Broadway
Denver, Colorado 80218
Telephone: (303) 297-1192

REFER TO



711 Independent Ave.
Grand Junction, Colo. 81505

January 31, 1989

Jimmy D. Taylor
Superintendent
Colorado National Monument
Fruita, Colorado 81521

Dear Mr. Taylor:

The Colorado Division of Wildlife is concerned with any expansion of the Colorado National Monument. It will have a detrimental effect on the Division's ability to manage wildlife in this area. The main management options we are worried about losing are hunting, habitat development, trapping for transplant or tagging and the option of being able to treat diseased or injured animals.

Expansion of the monument will close an area to hunting that is used by sportsmen for hunting bighorn sheep, deer, lion, small game and waterfowl. The area is important to hunters since it is one of the few large tracts of public land in the Pinyon Mesa area.

We are concerned that the DOW would lose the capability to manage mule deer in the Black Ridge area. The deer population is near the population objective we have set for the herd and we need to be able to control population size in order to prevent damage to the habitat as well as damage to agricultural crops and other private property in this area. We currently have a problem with deer from the existing monument coming into the Redlands and damaging orchards there. If any more of a refuge is established we may end up with a problem similar to that in Boulder Colorado. We are conducting a trapping and banding study at this time to better document seasonal ranges and the timing of migrations in order to better manage this herd.

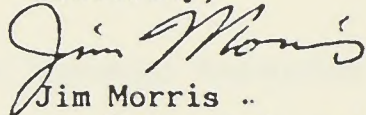
We are also very concerned about the future management of the desert bighorn sheep herd. The herd in the Black Ridge area was established in 1979 and is one of only three desert bighorn sheep herds in Colorado. The DOW has spent many thousands of the sportsmens dollars to re-establish desert sheep in Colorado. The demand for this species is extreme as evidenced by the 400 plus applications for two licenses in 1988. Our current objective is to increase this herd to approximately 400 animals. A desert sheep herd of this size would provide

Mr. Jimmy Taylor
Colorado National Monument
January 31, 1989
Page Two

many opportunities for recreation for the hunter as well as the photographer or other non-consumptive users of wildlife. There are many volumes of undisputable evidence that bighorn sheep herds cannot thrive without intensive management.

The Division of Wildlife will provide maps to you to use in your analysis. We believe it can be integrated with the BLM GIS system. Please contact me when you have identified your alternatives so that we will know what information will be most useful to you. Let me know if you need anything additional.

Sincerely,

A handwritten signature in cursive script that reads "Jim Morris".

Jim Morris ..
Wildlife Biologist

JM:sw

COLORADO 7 MESA
FIRST COLORADO R. E. A. PROJECT

Grand Valley Rural Power Lines, Inc.

ELECTRIFYING RURAL HOMES
Offices 2727 Grand Avenue
Grand Junction, Colorado 81501
(303) 242-0040

January 26, 1989

Mr. Jim Taylor, Superintendent
Colorado National Monument
Fruita, CO 81521

Subject: Colorado National Monument Expansion Study

Dear Mr. Taylor:

Grand Valley Rural Power Lines, Inc., currently holds a right-of-way grant Serial No. C-40202 with the U.S. Department of Interior, B.L.M. for a right-of-way of 55,400 feet in length by 50 feet in width for an existing overhead distribution electric power line. The line operates at 12,470 volts and is located near the west boundary of the Colorado National Monument; Black Ridge area. The line generally passes through the 1/4 mile B.L.M. Wilderness Study area.

The Black Ridge overhead line serves Grand Valley's Glade Park consumers, the Black Ridge Communications site and FAA Vortex. These sites provide an extremely important function to the Grand Valley and air traffic control at Walker Field. The lines up on Glade Park also provide electricity to the many residents that would otherwise be without power and light.

Grand Valley's position on the expansion of the Colorado National Monument is that in behalf of our Glade Park and Black Ridge consumers it is imperative that we maintain the present 50 foot right-of-way grant and conditions or rights as stipulated by the B.L.M.

As stated in the January 25, 1989 Grand Junction meeting, there are not other alternatives to the location of this existing "overhead" line without incurring a tremendous expense. Thus Grand Valley does not support administration of the B.L.M. grant by the N.P.S. or the unknown necessity to re-negotiate this grant with the N.P.S. that will directly affect Grand Valley's cost and ability to serve the consumers involved.

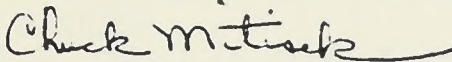
Mr. Jim Taylor
January 26, 1989
Page 2 --

Access to the right-of-way is extremely limited and prohibited from the Colorado National Monument and Grand Valley has been forced to use helicopter construction methods for line maintenance/rebuild.

Specifically, Grand Valley is very concerned that N.P.S. administration of this grant will result in potentially more restrictive requirements (and costs) in the day to day access, maintenance and modifications that may be required to serve the consumers involved. Thus Grand Valley cannot support the expansion of the Colorado Monument beyond the current west boundary and request that the management of the lands in question remain with the B.L.M.

Respectfully,

GRAND VALLEY RURAL POWER LINES, INC. ..



Chuck Mitisek
Manager of Engineering

cc: John Singlaub, B.L.M.

Formal Briefings Conducted on Ruby Canyon National Conservation Area
Proposal as of October 19, 1989

1. Colorado Outdoor Recreation Project - Grand Junction, 5/20/89.
2. Frank Snell and staff, BLM - Washington, 6/12/89.
3. Dan McAuliffe, Congressman Campbell - Washington, 6/12/89.
4. Russ Shea, Sen. Wirth - Washington, 6/12/89.
5. Terry Sopher & Darryl Knuffke, Wilderness Society - Washington, 6/14/89.
6. Kirk Koepsel, Colorado Environmental Coalition - Denver, 6/27/89.
7. Chris Sanborn, Wilderness Society - Denver, 6/27/89.
8. Tina Arapkiles, Sierra Club - Boulder, 6/28/89.
9. Suzanne Bohan, Sen. Wirth - Denver, 6/29/89.
10. Chips Barry, Director, Colorado Department of Natural Resources - Denver, 6/29/89.
11. Perry Olson, Director, Colorado Division of Wildlife - Denver, 6/29/89.
12. Bob Caskey, Regional Director, Colorado Division of Wildlife - Grand Junction, 7/10/89.
13. Frank Bering, Grand Junction Tourism Board, 7/11/89.
14. Barbara Creasman, Downtown Development Authority - Grand Junction, 7/11/89.
15. Dee Jacobson, Congressman Campbell - Grand Junction, 7/11/89.
16. Colorado Wildlife Commission - Denver, 7/12/89.
17. Grand Junction District Advisory Council, 9/21/89.
18. Sally Ranney, American Wilderness Alliance, 9/22/89.
19. Jim Martin, Sen. Wirth - Denver, 9/22/89.
20. Jerry Mallett, Adventures International, Inc. - Denver, 9/22/89.
21. Sean Conway, Sen. Armstrong - Denver, 9/22/89.
22. Kathy Hall, Sen. Armstrong - Grand Junction, 9/22/89.
23. Mesa County Commissioners, 9/26/89.

In addition, numerous informal presentations to Optimists, Rotary Clubs, media representatives, etc. have also been made in Grand Junction.

In July 1989, BLM conducted a river trip through Ruby Canyon that was attended by many of the above plus numerous elected officials, media, Chamber of Commerce, BLM officials, National Park Service representatives, state and local agencies and others. The focus of the trip was discussion of the NCA and the proposed park expansion.

